March 10, 2005

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT SECTION 313 TOXIC RELEASE INVENTORY DATA QUALITY INSPECTION

WHEELING CORRUGATING COMPANY BEECH BOTTOM, WEST VIRGINIA 26030

TRI Fac. ID: 26030WHLNGROUTE

Facility Address

WV Route 2 Beech Bottom, West Virginia 26030

Investigation Date

February 3, 2005

Investigator
Troy Jordan, Region 3, Environmental Scientist



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

Wheeling Office - Methodist Bldg. 1060 Chapline Street, Suite 303 Wheeling, WV 26003-2995



FINAL

ENFORCEMENT CONFIDENTIAL

DATE:

March 10, 2005

SUBJECT:

EPCRA Data Quality Inspection (CEI)

Wheeling Corrugating, Inc.

TRI ID. No. 2603WHLNGROUTE

FROM:

Troy Jordan, Environmental Scientist

OECEJ, Wheeling Field Office (3EC00)

TO:

Samantha Fairchild, Director

Office of Enforcement, Compliance and Environmental Justice (3EC00)

A Data Quality Inspection under EPCRA was performed by U.S. EPA Region 3 personnel of Wheeling Corrugating, Inc, EPCRA ID. No. 2603WHLNGROUTE, located in Beech Bottom, WV on February 3, 2005. Attached for your review is a EPCRA Data Quality Inspection report for the above referenced facility.

Please call me at (304) 234-0267 if you have any questions.

Attachment

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MEDIA REPORT

On February 3, 2005, the United States Environmental Protection Agency, Region III ("EPA"), Office of Enforcement, Compliance and Environmental Justice conducted an unannounced Data Quality Inspection under the Emergency Planning and Community Right-to-Know Act ("EPCRA"), as amended, 42 U.S.C. Sections 11001et seq. (1986) of the Wheeling Corrugating Company (Wheeling Corrugating) Beech Bottom, WV facility. USEPA Inspectors Troy Jordan conducted the inspection. The facility was represented by Bud Smith, Director of Environmental Control, and Pat Smith, Environmental Engineer for Wheeling Pittsburgh Steel Corporation the parent company of Wheeling Corrugating. This report discusses EPCRA data quality issues and compliance with the Toxic Release Inventory (TRI) requirements by Wheeling Corrugating.

REGULATORY SUMMARY

Under Section 313 of EPCRA, businesses covered by specified Standard Industrial Classifications (SIC), employing more than 10 full-time employees, and manufacturing, importing, processing, or otherwise using any of the chemicals listed in Section 313 of EPCRA in amounts greater than the specified thresholds must report the release of these chemicals to the environment annually. The purpose of this reporting requirement is to inform the public about the releases and other waste management of EPCRA Section 313 chemicals in their communities and to provide the government with information for research and the development of appropriate regulations. Wheeling Corrugating employs more than 10 full time employees, operates under SIC Code 3479 and exceeds threshold quantities for several EPCRA 313 Chemicals. Wheeling Corrugating meets the criteria stipulated in EPCRA 313 making them subject to annual TRI reporting.

ON-SITE INSPECTION SUMMARY

EPA's data quality inspection was conducted at the Beech Bottom, WV facility on February 3, 2005. Credentials were presented to Pat Smith, Environmental Engineer, Wheeling Pittsburgh Steel. A general inspector's overview of facility operations was presented by Mr. Smith, followed by a detailed discussion of facility processes including air emissions, water discharges, waste generation and handling, safety orientation, and a site tour. Mr. Smith also provided process flow diagrams for each of the two coating lines (Attachment A).

Process Description

Wheeling Corrugating consists of two coating lines designated as Coil Coating Line #1 (CCL#1) and Coil Coating Line #2 (CCL#2) and a cold press fabrication department. Coiled steel from Wheeling Pittsburgh Steel is uncoiled, coated, and then pressed into corrugated steel sheets in several designs to meet customer specifications.

Coil Coating Line #1

- Steel Coil is cold rolled through a alkaline cleaning bath (phosphoric acid) to remove any residual oils from the coil. The coil then moves through a chromic acid coater to help coating adhesion to the steel coil. Galvanized steel coils bypass the chrome coater. Emissions are directly vented to a stack.
- Steel coil proceeds through a natural gas drying oven, which is also vented to a stack.
- Steel coil is run through a primer coater unit. Primer coating is applied to the steel coil. At the time of the inspection, fumes were sent to an incinerator. During the inspection the company was in the process of constructing a regenerative thermal oxidizer. When completed, the fumes from this process will be redirected to the new thermal oxidizer. The new unit is expected to be online by June 2005.
- Steel coil moves to a natural gas fired primer bake oven. Fumes from this process are sent to an incinerator, but will be redirected to the new thermal oxidizer in the future.
- Steel coil is cooled through the primer quench tank. At the time of the inspection, fumes were sent to an incinerator. The fumes will be redirected to the new thermal oxidizer.
- Steel coil is then run through the finish coater. Finish coat is applied to the steel coil. At the time of the inspection, fumes were sent to an incinerator. The fumes will be redirected to the new thermal oxidizer.
- Steel coil moves to a natural gas finish bake oven. At the time of the inspection, fumes were sent to an incinerator. The fumes will be redirected to the new thermal oxidizer.
- Steel coil is cooled through a finish quench tank. At the time of the inspection, fumes were sent to an incinerator. The fumes will be redirected to the new thermal oxidizer.
- Steel coil is recoiled and can then be sent to one of four lines depending on customer specifications. The painted coils can go directly to market, to a roof deck corrugating line, to a tensilform corrugating line, or to a fabricating department. All corrugating and fabrication is done by cold steel rolling or presses, so no other waste or emissions are created through this process other than lube oil for operating the machinery.
- Finally the steel is packaged and stored for shipment to customers.

Coil Coating Line #2

- Steel Coil is cold rolled through a alkaline cleaning bath (phosphoric acid) to remove any residual oils from the coil. The coil then moves through a chromic acid coater to help coating adhesion to the steel coil. Galvanized steel coils bypass the chrome coater. Emissions are directly vented to a stack.
- Steel coil proceeds through a natural gas drying oven, which is also vented to a stack.
- Steel coil runs through an enclosed coating room that is connected to a air supply fan.

The coater room is also connected by two exhaust fans. The first fan removes fumes to a curing oven. The second fan removes fumes through a heat exchanger to a natural gas fired thermal oxidizer.

- Steel coil moves to a natural gas fired three zone curing oven. The emissions from the oven move through a heat exchanger to a thermal oxidizer.
- Steel coil is cooled through a quench tank. An exhaust fan removes fumes from the quench tank to the heat exchanger and thermal oxidizer. All fumes and emissions from the thermal oxidizer are sent to a single stack.
- The steel coil is recoiled and sent to the same finishing lines as CCL #1, packaged, and stored for shipment to customers.

Emission, Waste, and Wastewater Evaluation

Emissions are created from the numerous volatile coatings and volatile solvents used to thin the coatings. These emissions are both fugitive and point source emissions. Wheeling Corrugating calculates these emission for their emission inventory per the Clean Air Act (CAA), as well as calculations for toxic release inventory (TRI) per EPCRA Section 313. Wheeling Corrugating provided their spreadsheets for reporting emission TRI data, as well as an emission inventory summary. See **Attachment B & C**.

Waste is primarily created through the clean out of coating operations when the company has to change coatings to meet customer specifications. The clean out involves solvents and paint/coating waste. These waste are manifested off-site as hazardous waste per the Resource Conservation & Recovery Act (RCRA) Subtitle C. Wheeling Corrugating is registered as a large quantity generator and reports waste operations through biennial waste summaries submitted to West Virginia. Wheeling Corrugating provided their spreadsheets for reporting waste TRI data, as well as copies of their biennial waste summaries. See Attachment B & D.

Wastewater is created from preparatory cleaning and quenching operations. Wheeling Corrugating operates a small wastewater treatment plant under a Clean Water Act (CWA) National Pollution Discharge Elimination System (NPDES) permit. The plant primarily treats the wastewater to remove zinc, iron, cyanide, chromium, copper and neutralize the acidic wastewater. Wheeling Corrugating provided their spreadsheets for reporting wastewater TRI data, as well as copies of their monthly monitoring reports under their NPDES permit. See Attachment B & E.

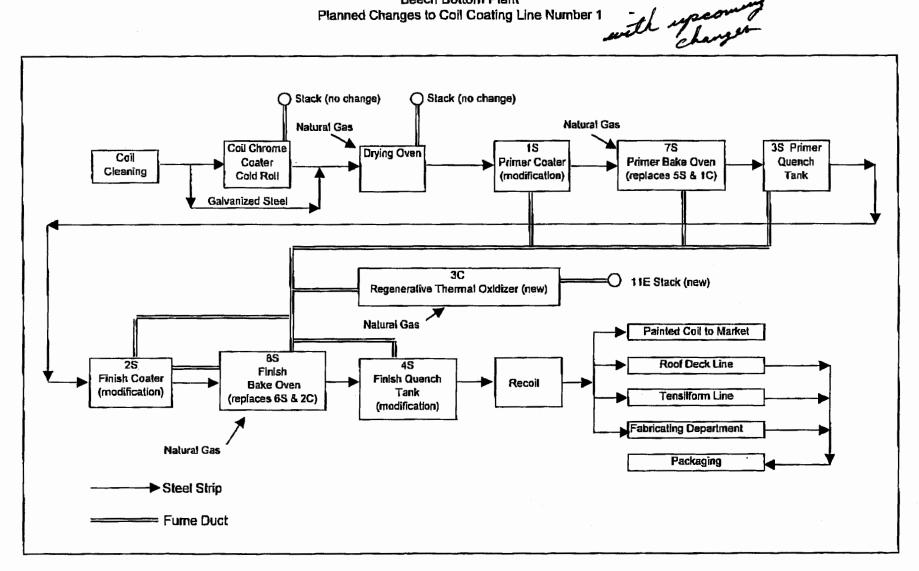
INSPECTION SUMMARY

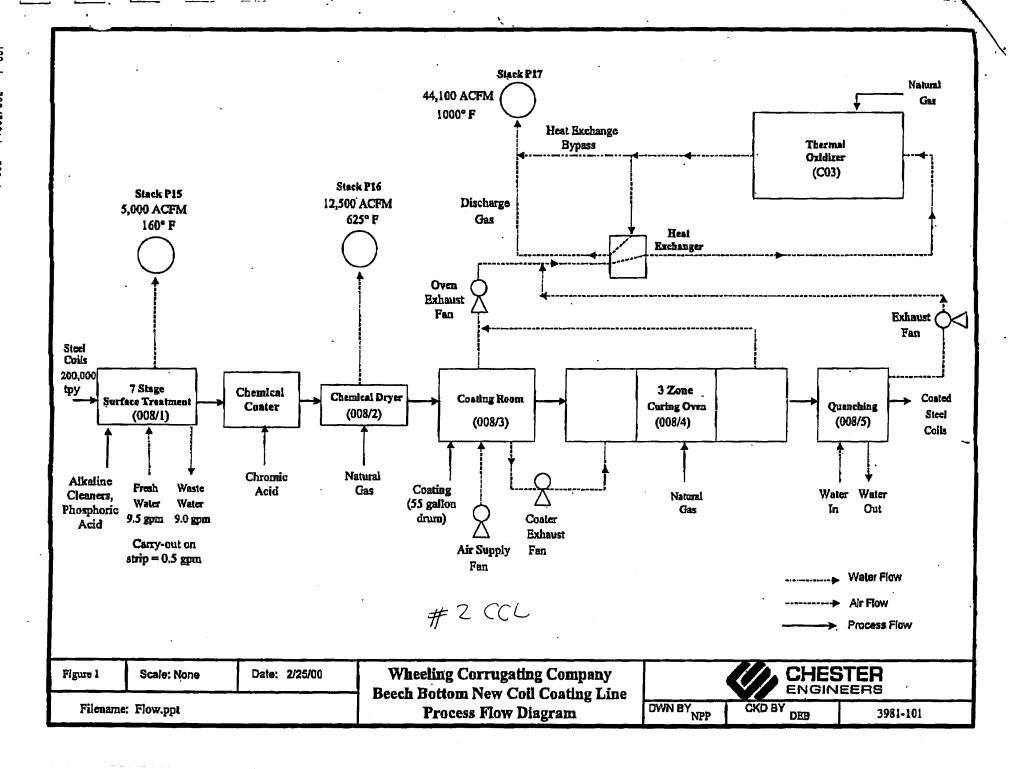
Although Wheeling Corrugating's reporting under RCRA, CWA, & CAA showed no significant deviation from reporting under TRI, there are still wide flux in the reporting from year to year in the facilities TRI reporting. TRI data was collected prior to the investigation through the EPA IDEA (Attachment F) database, which indicated significant differences in reporting from year to year and in particular for the 1999 and 2000 reporting years. During the inspection, Pat Smith and Bud Smith of Wheeling Corrugating were interviewed about the erratic trends in

reporting. Both gentlemen indicated that a number of factors surrounding the last several years have contributed to the companies TRI reporting. Wheeling Corrugating experienced a labor strike between October 1996 and August 1997. Wheeling Corrugating entered into bankruptcy in November 2000 and emerged from bankruptcy in August 2003. Wheeling Corrugating also receives all of its steel coils from its parent company Wheeling Pittsburgh Steel, which were experiencing the same conditions previously stated as well as lower demand for American steel in the world market. Bud and Pat Smith stated that these outside factors contributed to changes in production, products used, and company structure that could effect the overall reporting for TRI. While it can't be denied that these factors did have an effect that could show changes in TRI reporting, Pat Smith was asked to provide a written explanation for reporting changes for specific chemicals for the 1999-2002 reporting years. Pat Smith provided this information on February 28, 2005. These questions and explanations can be found in **Attachment G**, along with the TRI Form R's for 2001-2003. In conclusion, no findings were found during this TRI Data Quality Inspection.

ATTACHMENT A
Process Flow Diagram

Wheeling Corrugationg Company Beech Bottom Plant Planned Changes to Coil Coating Line Number 1





ATTACHMENT B
Wheeling Corrugating SARA Title III Section 313 Release Inventory 2001-2003

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Prepared for: WHEELING CORRUGATING COMPANY - BEECH BOTTOM PLANT

Route 2

Beech Bottom, West Virginia 26030

Prepared by: Wheeling-Pittsburgh Steel Corporation

Environmental Control Department

Contents of Spreadsheet:

Facility Section 313 Chemicals and De Minimis Concentrations

Quantities of Section 313 Chemicals in Materials Manufactured, Processed, and Otherwised Used

Corresponds to Form R Sections:
5.1 Fugitive or Non Point Air Emissions
5.2 Stack or Point Air Emissions

Corresponds to Form R Section:
5.3 Discharges to Receiving Streams or Water Bodies

Marine North State Continued in the Cont

Corresponds to Form R Sections: 5.4 Underground Injections On-Site

5.5 Releases to Land On-Site

6.2 Transfers to Other Off-Site Locations (Production-Related Disposal Sources Only: Codes M10, M71, M72, M73, M79, M90, M94, & M99)

continued

2000 SARA TITLE III - SECTION 313 - RELEASE INVENTORY WHEELING CORRUGATING COMPANY - BEECH BOTTOM PLANT

Contents of Spreadsheet (continued)

Corresponds to Form R Sections: 8.1 Quantity Released (Sum of Worksheets C, D, & E)

Corresponds to Form R Sections:

- 6.2 Transfers to Other Off-Site Locations (Production-Related Energy Recovery Sources Only: Codes M56 & M92)
 - 8.2 Quantity Used for Energy Recovery On-Site
 - 8.3 Quantity Used for Energy Recovery Off-Site

Corresponds to Form R Section:

- 6.2 Transfers to Other Off-Site Locations (Production-Related Recycle Sources Only: Codes M20, M24, M26, M28, & M93)
 - 8.4 Quantity Recycled On-Site
 - 8.5 Quantity Recycled Off-Site

Corresponds to Form R Sections:

- 6.1 Discharges to Publicly Owned Treatment Works
- 6.2 Transfers to Other Off-Site Locations (Production-Related Treatment Sources Only: Codes
- 8.6 Quantity Treated On-Site

M40, M50, M54, M61, M69, & M95)

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8.7 Quantity Treated Off-Site

Corresponds to Form R Sections:

- 6.2 Transfers to Other Off-Site Locations (Non-Production Related Releases to Land and Energy Recovery, Recycle, and Treatment Sources Only)
- 8.8 Quantity Released to the Environment as a Result of Remedial Actions, Catastrophic Events, or One-Time Events Not Associated with Production Processes

Corresponds to Form R Sections:

8.9 Production Ratio or Activity Index

WHEELING-PITTSBURGH STEEL CORPORATION BEECH BOTTOM PLANT SUMMARY OF 2000 AND 2001 REPORTING YEARS SARA SECTION 313 REPORTING QUANTITIES

		Total					
		Releases ^(1,2)					
REPORTABLE CHEMICAL	2000	2001	Change				
Chromium Compounds	NA	11	NA				
Glycol Ethers	14,354	37,961	164.46%				
Ethylbenzene	NR	10,166	NA				
n-Butyl Alcohol	18,465	18,853	2.10%				
Naphthalene	8,694	8,101	-6.82%				
Xylene	11,189	16,236	45.11%				
Zinc Compounds	3,873	1,968	-49.19%				
1,2,4-Trimethylbenzene	5,860	30,292	416.92%				
TOTAL CHEMICAL QUANTITIES	62,435	123,587	97.95%				

- (1) All quantities are reported as pounds.
- (2) Total releases includes all releases to the environment due to normal process operations. Transfers to POTWs and accidental, remediation, and one-time events are not included.

TABLE 3

WHEELING CORRUGATING COMPANY BEECH BOTTOM PLANT

SUMMARY OF 2000 VS 2001 REPORTING YEAR SARA SECTION 313 REPORTING QUANTITIES

	F	ugitive Sour Air Releases		1	Point Source Air Releases			eleases to Wa dies or Strea			Transfers to POTWs	
REPORTABLE CHEMICAL (1)	2000	2001	Change	2000	2001	Change	2000	2001	Change	2000	2001	Change
Chromium Compounds	NA ⁽²⁾	NA	NA	NA	NA	NA	6	3	NA	NA	NA	NA
Glycol Ethers	7,783	20,584	164.5%	6,571	17,377	164.45%	NA NA	0	NA	NA	NA	NA
Ethylbenzene	NR	5,513	NA	NR	4,654	NA	NA	0	NA	NA	NA	NA
n-Butyl Alcohol	10,012	10,223	2.10%	8,452	8,630	2.11%	NA	0	NA	NA	NA	NA
Naphthalene	4,714	4,393	-6.81%	3,980	3,709	-6.82%	NA	0	NA	. NA	NA	NA
Xylene	6,067	8,804	45.11%	5,122	7,432	45.11%	NA	0	NA	NA	NA	NA
Zinc Compounds	NA	NA	NA	NA	NA	NA	81	213	162.63%	NA	NA	NA
1,2,4-Trimethylbenzene	3,177	16,425	417.00%	2,682	13,866	417.02%	NA	0	NA	NA	NA	NA
TOTAL CHEMICAL QUANTITIES	31,753	65,941	107.67%	26,807	55,668	107.66%	87	216	148.54%	0	0	NA
		*******		Off-Site Other Release	es	Total Releases ⁽³⁾				COMMENTS		
REPORTABLE CHEMICAL (1)	2000	2001	Change	2000	2001	Change	2000	2001	Change			
Chromium Compounds	NA	NA	NA	NA	7	NA	NA	11	NA			
Glycol Ethers	NA	NA	NA	NA	NA	NA	14,354	37,961	164.46%			
Ethylbenzene	NA	NA	NA	NA	NA	NA	NR	10,166	NA			
n-Butyl Alcohol	NA	NA	NA	NA	NA	NA	18,465	18,853	2.10%			
Naphthalene	NA	NA	NA	NA	NA	NA	8,694	8,101	-6.82%			
Xylene	NA	NA	NA	NA	NA	NA	11,189	16,236	45.11%			
Zinc Compounds	NA	NA	NA	3,792	1,755	-53.72%	3,873	1,968	-49.19%			
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NR	NA	5,860	30,292	416.92%			
TOTAL CHEMICAL QUANTITIES	0	0	0.00%	3,792	1,762	-53.52%	62,435	123,587	97.95%			

⁽¹⁾ All quantities are reported as pounds.

⁽²⁾ NA" indicates not applicable. NR indicates not reportable.

⁽³⁾ Total releases includes all releases to the environment due to normal process operations. Transfers to POTWs and accidental, remediation, and one-time events are not included.

⁽⁴⁾ Non production related releases includes accidental, remediation, and one-time events.

TABLE 3

WHEELING CORRUGATING COMPANY BEECH BOTTOM PLANT SUMMARY OF 2000 VS 2001 REPORTING YEAR SARA SECTION 313 REPORTING QUANTITIES

	E	On-Site nergy Recove	ery	E	Off-Site nergy Recove	ery	On-Site Recycling			Off-Site Recycling		
REPORTABLE CHEMICAL (1)	2000	2001	Change	2000	2001	Change	2000	2001	Change	2000	2001	Change
Chromium Compounds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Glycol Ethers	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Butyl Alcohol	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	. NA
Xylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc Compounds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL CHEMICAL QUANTITIES	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

	On-Site				Off-Site		Non Production			
		Treatment			Treatment		Related Releases (4)		:s ⁽⁴⁾	COMMENTS
REPORTABLE CHEMICAL (1)	2000	2001	Change	2000	2001	Change	2000	2001	Change	
Chromium Compounds	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Glycol Ethers	182,627	167,875	-8.08%	NA	NA	NA	NA	NA	NA	
Ethylbenzene	NR	44,960	NA	NA	NA	NA	NA	NA	NA	
n-Butyl Alcohol	NA	83,374	NA	NA	NA	NA	NA	NA	NA	
Naphthalene	28,961	35,827	23.71%	NA	NA	NA	NA	NA	NA	
Xylene	46,532	71,803	54.31%	NA	NA	NA	NA	NA	NA	
Zinc Compounds	NA	NA	·NA	NA	NA	NA	NA	NA	NA	
1,2,4-Trimethylbenzene	150,045	133,960	-10.72%	NA	NA	NA	NA	NA	NA	
TOTAL CHEMICAL QUANTITIES	408,165	537,797	31.76%	NA	NA	NA	NA	NA	NA	

- (1) All quantities are reported as pounds.
- (2) NA" indicates not applicable. NR indicates not reportable.
- (3) Total releases includes all releases to the environment due to normal process operations. Transfers to POTWs and accidental, remediation, and one-time events are not included.
- (4) Non production related releases includes accidental, remediation, and one-time events.

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -
- Section 313 Reporting -

Facility Section 313 Chemicals and **De-Minimis Concentrations**

De-Minimis Concentration (Weight %) 1.0 0.1 1.0 0.1 1.0 1.0 1.0 1.	Volatile Compound (N or Y) N N N N N N Y Y Y Y	Reportable Chemical (N or Y) N N N N N N Y N N N N N N N N N N N
(Weight %) 1.0 0.1 1.0 0.1 1.0 1.0 1.0 1.	(N or Y) N N N N N N N N Y N Y Y	(N or Y) N N N N N N N Y N N Y Y Y
1.0 0.1 0.1 1.0 0.1 1.0 1.0 1.0	N N N N N Y Y Y Y	N N N N Y N N N Y Y Y Y
0.1 0.1 1.0 0.1 1.0 1.0 1.0 1.0	N N N N N Y N Y	N N N Y N N N Y Y Y Y Y
0.1 1.0 0.1 1.0 1.0 1.0 1.0 0.1	N N N N Y N Y	N N Y N N N Y Y
1.0 0.1 1.0 1.0 1.0 1.0 0.1	N N N Y N Y	N Y N N Y Y Y Y
0.1 1.0 1.0 1.0 1.0 0.1	N N Y N Y Y	Y N N Y Y
1.0 1.0 1.0 1.0 0.1	N Y N Y Y	N N N Y Y
1.0 1.0 1.0 0.1	Y N Y Y	N N Y Y
1.0 1.0 0.1 0.1	N Y Y	N Y Y
1.0 0.1 0.1	Y Y	Y Y
0.1	Y	Y
0.1		
	Y	N
1.0		14
	N	N
1.0	N	N
0.0	N	N
1.0	N	N
1.0	Y	N
1.0	Y	N
1.0	N	N
1.0	Y	Y
1.0	Y	Y
0.1	N	N
1.0	N	N
1.0	Y	N
1.0	N	N
1.0	Y	N
		Y
1.0	Y	Y
1.0	Y N Y	Y
		1.0 Y 1.0 Y

(1)Sulfuric Acid is only reportable as a fume.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Coating Line Steel

INFORMATIONAL PURPOSES ONLY - ARTICLE EXEMPTION APPLIES

2001

2000

Total Processed(tons):

151,932

162,199

Section 313 Chemicals
Contained in Steel Coated

Threshold:

25,000 lbs

			Quantity	y ^(a) of	Exceeds	Reportable
	Concentra	ation ⁽¹⁾	313 Che	mical	Threshold	Based on
Section 313	(Weigh	it %)	(lbs	i) [for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds	0.001	0.001	3,039	3,244	N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds	0.020	0.014	60,773	45,416	Y	N
Copper Compounds	0.029	0.019	88,121	61,636	N	N
Cumene					N	N
Cyanide Compounds					N	N
Glycol Ethers					Y	N
Ethylbenzene					Y	N
Formaldehyde					N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds	0.380	0.410	1,154,683	1,330,032	N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum ⁽²⁾	0.006	0.006	18,232	19,464	N	N
n-Butyl Alcohol					Y	N
Naphthalene					Y	N
Nickel Compounds	0.005	0.005	15,193	16,220	N	N
Nitric Acid					N	N
sec-Butyl Alcohol					N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene					Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene					Y	N
Totals			1,340,040	1,476,011		

NOTES

(1)Concentrations From 2001 and 2000 Wheeling-Pittsburgh Steel Corporation Analysis.

(2)Reportable As Molybdenum Trioxide; Multiply By 1.5 To Obtain Molybdenum Trioxide Concentration And Quantity.

FORMULAS

(a)Total Processed x (Concentration/100) x 2,000.

WHEELING CORRUGATING CO. Sulfuric Acid (liquid) (2) BEECH BOTTOM PLANT - 2001 SARA Title III -- Section 313 Reporting -Total Used (2001): NA gal Total Used (2000): NA gal Section 313 Chemicals Density: 14.2 lbs/gal Contained in Water and Threshold: 10,000 lbs Wastewater Treatment Supplies -Sulfuric Acid Quantity(a) of Exceeds Reportable 313 Chemical Threshold Based on Concentration(1) Section 313 (lbs) for Facility De-Minimis Chemical (Weight %) 2001 2000 (Y or N) (Y or N) Ammonia N N Arsenic Compounds N N Cadmium Compounds N N Chlorine N N **Chromium Compounds** Y N N Copper Compounds N N Cumene N Cyanide Compounds N N Glycol Ethers N Ethylbenzene Y N Formaldehyde N N Hydrochloric Acid N N Hydrogen Fluoride N N Lead Compounds N Y Manganese Compounds N N Methyl Ethyl Ketone N N Methyl IsoButyl Ketone N N Molybdenum Trioxide N N n-Butyl Alcohol Y N Naphthalene Y N Nickel Compounds N N Nitric Acid N N sec-Butyl Alcohol N N Sulfuric Acid 0 N N Toluene N N Xylene Y N Zinc Compounds Y N 1,2,4-Trimethylbenzene $\overline{\mathbf{Y}}$ N Totals 0 0 NOTES (1)Concentrations From Material Safety Data Sheet. (2) Sulfuric acid is only reportable as an aerosol. **FORMULAS**

(a)Total Used x Density x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Chlorine - 2001 SARA Title III -- Section 313 Reporting -Total Used (2001): 1,715 lbs Total Used (2000): 2,800 lbs Section 313 Chemicals Threshold: 10,000 lbs Contained in Water and Wastewater Treatment Supplies -Chlorine Quantity(a) of Reportable Exceeds 313 Chemical Threshold Based on Concentration(1) for Facility Section 313 (lbs) De-Minimis Chemical (Weight %) 2001 2000 (Y or N) (Y or N) Ammonia N N Arsenic Compounds N N Cadmium Compounds N N Chlorine 99.9 1,713 2,797 Y N Chromium Compounds Y N Copper Compounds N N N N Cumene Cyanide Compounds N N Glycol Ethers Y N Ethylbenzene Y N Formaldehyde N N Hydrochloric Acid N N Hydrogen Fluoride N N Lead Compounds N Y Manganese Compounds N N Methyl Ethyl Ketone N N Methyl IsoButyl Ketone N N Molybdenum Trioxide N N n-Butyl Alcohol Y N Naphthalene Ÿ N Nickel Compounds N N Nitric Acid N N sec-Butyl Alcohol N N Sulfuric Acid N N Toluene N N Xylene $\overline{\mathbf{Y}}$ N Zinc Compounds Y N 1,2,4-Trimethylbenzene Y N Totals 1,713 2,797 NOTES (1)Concentrations From Material Safety Data Sheet. **FORMULAS** (a)Total Used x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Water and Wastewater Treatment Supplies

	Water	Water and Wastewater Treatment Supplies					
Section 313	Sulfuric	Acid	Chlor	ine	Quantity (lbs)		
Chemical	(lbs)	(lbs)			
	2001	2000	2001	2000	2001	2000	
Ammonia							
Arsenic Compounds							
Cadmium Compounds							
Chlorine			1,713	2,797	1,713	2,797	
Chromium Compounds							
Copper Compounds							
Cumene							
Cyanide Compounds							
Glycol Ethers							
Ethylbenzene							
Formaldehyde							
Hydrochloric Acid							
Hydrogen Fluoride							
Lead Compounds							
Manganese Compounds							
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone							
Molybdenum Trioxide							
n-Butyl Alcohol							
Naphthalene							
Nickel Compounds							
Nitric Acid							
sec-Butyl Alcohol							
Sulfuric Acid							
Toluene							
Xylene							
Zinc Compounds							
1,2,4-Trimethylbenzene							
Totals	0	0	1,713	2,797	1,713	2,797	

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Water and Wastewater Treatment Supplies Greater Than De-Minimis Concentration

	Water and Wastewate	Total	
Section 313	Sulfuric		Quantity
Chemical	Acid	Chlorine	> De-Minimis
•	(lbs)	(lbs)	(lbs)
Ammonia			
Arsenic Compounds			
Cadmium Compounds			
Chlorine		1,713	1,713
Chromium Compounds			
Copper Compounds			
Cumene			
Cyanide Compounds			
Glycol Ethers			
Ethylbenzene			
Formaldehyde	,		
Hydrochloric Acid			
Hydrogen Fluoride			
Lead Compounds			
Manganese Compounds			
Methyl Ethyl Ketone			
Methyl IsoButyl Ketone			
Molybdenum Trioxide			
n-Butyl Alcohol			
Naphthalene			
Nickel Compounds			
Nitric Acid			
sec-Butyl Alcohol			
Sulfuric Acid			
Toluene			
Xylene			
Zinc Compounds			
1,2,4-Trimethylbenzene			
Totals	0	1,713	1,713

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Bulk 309R

Total Used (2001): Total Used (2000): 281,411 lbs 420,000 lbs

Threshold:

10,000 lbs

Section 313 Chemicals
Contained in Chemical Cleaners Bulk 346WX

Concentration ⁽¹⁾	Quantity 313 Che	1	Exceeds Threshold	Reportable
Concentration ⁽¹⁾	313 Che	mical	Threshold	Daniel
Concentration ⁽¹⁾		313 Chemical		Based on
	(lbs	6	for Facility	De-Minimis
(Weight %)	2001	2000	(Y or N)	(Y or N)
			N	N
			N	N
			N	N
			N	N
			Y	N
			N	N
			N	N
			N	N
			Y	N
			Y	N
			N	N
			N	N
0.63	1,773	2,646	N	N
			N	Y
			N	N
			N	N
			N	N
			N	N
			Y	N
			Y	N
1.76	4,953	7,392	N	Y
			N	N
			N	N
			N	N
			N	N
				N
8.1	22,794	34,020		Y
			Y	N
	29,520	44,058		
	0.63	0.63 1,773 1.76 4,953 8.1 22,794	0.63 1,773 2,646 1.76 4,953 7,392 8.1 22,794 34,020	N N N N N N N N N N N N N N N N N N N

(1)Concentrations From Material Safety Data Sheet.

FORMULAS

(a)Total Used x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Bulk Bond NP400B

Total Used (2001):

187,395 lbs 120,000 lbs

Total Used (2000): Threshold:

10,000 lbs

Section 313 Chemicals
Contained in Chemical Cleaners Bulk Bond NP400B

		Quantity ^(a) of		Exceeds	Reportable
		313 Ch	emical	Threshold	Based on
Section 313	Concentration ⁽¹⁾	(lbs)		for Facility	De-Minimis
Chemical	(Weight %)	2001	2000	(Y or N)	(Y or N)
Ammonia				N	N
Arsenic Compounds				N	N
Cadmium Compounds				N	N
Chlorine				N	N
Chromium Compounds	4	7,496	4,800	Y	Y
Copper Compounds				N	N
Cumene				N	N
Cyanide Compounds				N	N
Glycol Ethers				Y	N
Ethylbenzene				Y	N
Formaldehyde				N	N
Hydrochloric Acid				N	N
Hydrogen Fluoride				N	N
Lead Compounds				N	Y
Manganese Compounds				N	N
Methyl Ethyl Ketone				N	N
Methyl IsoButyl Ketone				N	N
Molybdenum Trioxide				N	N
n-Butyl Alcohol				Y	N
Naphthalene				Y	N
Nickel Compounds				N	N
Nitric Acid				N	N
sec-Butyl Alcohol				N	N
Sulfuric Acid	,			N	N
Toluene				N	N
Xylene				Y	N
Zinc Compounds				Y	N
1,2,4-Trimethylbenzene				Y	. N
Totals		7,496	4,800		
NOTES					

NOTES

(1)Concentrations From Material Safety Data Sheet.

FORMULAS

(a)Total Used x (Concentration/100).

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

- Section 313 Reporting -

Bulk Phosbond #1

Total Used (2001): Total Used (2000): 16,000 lbs 16,000 lbs

Threshold:

10,000 lbs

Section 313 Chemicals Contained in Chemical Cleaners -Bulk Phosbond #1

			Quantity ^(a) of		Exceeds	Reportable
	Concen	tration ⁽¹⁾	313 CI	nemical	Threshold	Based on
Section 313	(Weis	ght %)	1 0	os)	for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene					N	N
Cyanide Compounds					N	N
Glycol Ethers					Y	N
Ethylbenzene					Y	N
Formaldehyde					N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol					Y	N
Naphthalene					Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol					N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene					Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene					Y	N
Totals			0	0		
NOTES						

(1)Concentrations From Material Safety Data Sheet.

FORMULAS

(a)Total Used x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Chemical Cleaners

			Chemical (Cleaners				
	Bull	(Bulk B	ond	Bı	ılk	Tot	al
Section 313	3091	۱ ۱	NP40	0В	Phosbe	ond #1	Quar	ntity
Chemical	(lbs	, 1	(lbs	a	(Il	ng)	(lb	•
Onomical	2001	2000	2001	2000	2001	2000	2001	2000
Ammonia								
Arsenic Compounds								
Cadmium Compounds								
Chlorine								
Chromium Compounds			7,496	4,800			7,496	4,800
Copper Compounds					J.1.			
Cumene								
Cyanide Compounds								
Glycol Ethers								
Ethylbenzene								
Formaldehyde								
Hydrochloric Acid								
Hydrogen Fluoride	1,773	2,646					1,773	2,646
Lead Compounds								
Manganese Compounds								
Methyl Ethyl Ketone								
Methyl IsoButyl Ketone								
Molybdenum Trioxide								,
n-Butyl Alcohol								
Naphthalene								
Nickel Compounds	4,953	7,392					4,953	7,392
Nitric Acid								
sec-Butyl Alcohol								
Sulfuric Acid								
Toluene								
Xylene								
Zinc Compounds	22,794	34,020					22,794	34,020
1,2,4-Trimethylbenzene								
Totals	29,520	44,058	7,496	4,800	0	0	37,016	48,858

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Chemical Cleaners in Greater Than De-Minimis Concentration

	C			
		Bulk	Bulk	Total
Section 313	Bulk	Bond	Phosbond	Quantity
Chemical				
Cnemical	346WX	NP400B	#1	> De-Minimis
	(lbs)	(lbs)	(lbs)	(lbs)
Ammonia				ļ
Arsenic Compounds				
Cadmium Compounds				
Chlorine				
Chromium Compounds		7,496		7,496
Copper Compounds				
Cumene				
Cyanide Compounds				
Glycol Ethers				
Ethylbenzene				
Formaldehyde				
Hydrochloric Acid				
Hydrogen Fluoride				
Lead Compounds				
Manganese Compounds				
Methyl Ethyl Ketone				
Methyl IsoButyl Ketone				
Molybdenum Trioxide				
n-Butyl Alcohol				
Naphthalene				
Nickel Compounds	4,953			4,953
Nitric Acid				
sec-Butyl Alcohol				
Sulfuric Acid				
Toluene				
Xylene ,				
Zinc Compounds	22,794			22,794
1,2,4-Trimethylbenzene				
Totals	27,747	7,496	0	35,243

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Yenkin-Majestic E-1388 - 2001 SARA Title III -2001 2000 Processed/Used (gals): - Section 313 Reporting -51,532 625,857 Density (lb/gal): 11.539 Threshold (lbs) . Section 313 Chemicals Volatiles: 10,000 Contained in Coil Coating Line Supplies onvolatiles: 25,000 Quantity(a) of Exceeds Reportable Concentration(1) 313 Chemical Threshold Based on (Weight %) De-Minimis Section 313 (lbs) for Facility 2001 2000 2001 2000 Chemical (Y or N) (Y or N) Ammonia N N N N Arsenic Compounds Cadmium Compounds N N Chlorine N N Chromium Compounds Y N Copper Compounds N N N N Cumene Cyanide Compounds N N Glycol Ethers 5.40 5.40 32,110 389,975 Y Y Ethylbenzene 0.50 0.50 2,973 36,109 Y Ÿ N N Formaldehyde Hydrochloric Acid N N Hydrogen Fluoride N N Lead Compounds \overline{N} Y Manganese Compounds N N Methyl Ethyl Ketone N N Methyl IsoButyl Ketone N N Molybdenum Trioxide N N n-Butyl Alcohol Y N 2.00 2.00 11,893 144,435 Y Ÿ Naphthalene Nickel Compounds N N Nitric Acid N N sec-Butyl Alcohol N N Sulfuric Acid N N Toluene N N Xylene 2.00 2.00 11,893 144,435 Y Y 4.40 4.40 26,164 317,758 Y Y Zinc Compounds 1,2,4-Trimethylbenzene Ÿ N 85,032 1,032,712 Total NOTES (1)Concentrations From Yenkin-Majestic Personnel

(2)Total Processed x (Concentration/100).

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Yenkin-Majestic P-9810

2001 23,296 2000

Processed/Used (gals): - Section 313 Reporting -

258,217

Density (lb/gal):

9.59

Threshold (lbs)

Volatiles:

10,000

25,000

Nonvolatiles:

				Quantity(a) of		Reportable
	Concentr	ration(1)	313 Ch	emical	Threshold	Based on
Section 313	(Weig	ht %)	(lb:	s)	for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia				311 31	N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene					N	N
Cyanide Compounds					N	N
Glycol Ethers	2.79	2.79	6,233	69,089	Y	Y
Ethylbenzene	0.80	0.80	1,787	19,810	Y	Y
Formaldehyde	0.20	0.20	447	4,953	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	1.50	1.50	3,351	37,145	Y	Y
Naphthalene	2.00	2.00	4,468	49,526	Y	Y
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol					N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	2.30	2.30	5,138	56,955	Y	Y
Zinc Compounds	1.19	1.19	2,653	29,406	Y	Y
1,2,4-Trimethylbenzene					Y	N
Total			24,078	266,884		

NOTES

(1)Concentrations From Yenkin-Majestic Personnel

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Yenkin-Majestic E-2421

2001

2000

Processed/Used (gals):

90,116

151,140

Density (lb/gal):

10.75

Threshold (lbs)

Volatiles:

10,000

Nonvolatiles:

25,000

			Quantity(a) of		Exceeds	Reportable
	Concentration(1)		313 Chemical		Threshold	Based on
Section 313	(Weigh	ht %)	(lb	s)	for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene					N	N
Cyanide Compounds					N	N
Glycol Ethers					Y	N
Ethylbenzene	5.00	5.00	48,437	81,238	Y	Y
Formaldehyde					N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	5.00	5.00	48,437	81,238	Y	Y
Naphthalene					Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol					N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	5.00	5.00	48,437	81,238	Y	Y
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	5.00	5.00	48,437	81,238	Y	Y
Total			193,749	324,951		

NOTES

(1)Concentrations From Yenkin-Majestic Personnel

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Yenkin-Majestic E-2489

2001

2000 34,577

Processed/Used (gals):

16,692

Density (lb/gal):

9.5

o, gai).

Threshold (lbs)

Volatiles:

10,000

Nonvolatiles:

25,000

			Quantity(a) of		Exceeds	Reportable
	Concentration(1)		313 Chemical		Threshold	Based on
Section 313	(Weigh	nt %)	(lb	s)	for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene					N	N
Cyanide Compounds					N	N
Glycol Ethers	5.00	5.00	7,929	16,424	Y	Y
Ethylbenzene	1.00	1.00	1,586	3,285	Y	Y
Formaldehyde					N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	10.00	10.00	15,857	32,848	Y	Y
Naphthalene	5.00	5.00	7,929	16,424	Y	Y
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol					N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	5.00	5.00	7,929	16,424	Y	Y
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene					Y	N
Total			41,229	85,406		

NOTES

(1)Concentrations From Yenkin-Majestic Personnel

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

- Section 313 Reporting -

Valspar PTY0016 - Primer

2001

2000

56,106

Processed/Used (gals):

53,817

11.05

Density (lb/gal):

Threshold (lbs)

Volatiles: 10,000

onvolatiles:

25,000

Section 313 Chemicals Contained in Coil Coating Line Supplies

		Quantity(a) of		Exceeds	Reportable
Concentr	Concentration(1)		313 Chemical		Based on
(Weig	ht %)	(lbs)		for Facility	De-Minimis
2001	2000	2001	2000	(Y or N)	(Y or N)
				N	N
				N	N
				N	N
				N	N
15.90	15.90	94,554	98,575	Y	Y
				N	N
0.10	0.10	595	620	N	N
				N	N
13.30	13.30	79,092	82,456	Y	Y
0.0004	0.0004	2	2	Y	N
				N	N
				N	N
				N	N
				N	Y
				N	N
				N	N
				N	N ·
				N	N
				Y	N
1.20	1.20	7,136	7,440	Y	Y
				N	N
				N	N
				N	N
				N	N
				N	N
0.30	0.30	1,784	1,860	Y	N
				Y	N
1.40	1.40	8,325	8,680	Y	Y
		191,488	199,633		
	(Weig 2001 15.90 15.90 0.10 13.30 0.0004 1.20	(Weight %) 2001 2000 15.90 15.90 0.10 0.10 13.30 13.30 0.0004 0.0004 1.20 1.20 0.30 0.30	Concentration(1) (Weight %) (Ib 2001 2000 2001 15.90 15.90 94,554 0.10 0.10 595 13.30 13.30 79,092 0.0004 0.0004 2 1.20 1.20 7,136	Concentration(1) (Weight %) (lbs) 2001 2000 2001 2000 15.90 15.90 94,554 98,575 0.10 0.10 595 620 13.30 13.30 79,092 82,456 0.0004 0.0004 2 2 1.20 1.20 7,136 7,440 0.30 0.30 1,784 1,860 1.40 1.40 8,325 8,680	Concentration(1) (Weight %) 313 Chemical (Ibs) Threshold for Facility 2001 2000 2001 2000 (Y or N) N N N N N N N N 15.90 15.90 94,554 98,575 Y N N N N 13.30 13.30 79,092 82,456 Y 0.0004 0.0004 2 2 Y N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N N

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

Valspar SPW0040 - White

2001

2000

- Section 313 Reporting - Processed/Used (gals):

: 36,775

54,798

Density (lb/gal):

12.05

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

Section 313 Chemicals
Contained in Coil Coating Line Supplies

			Quantity(a) of		Exceeds	Reportable
	Concentration(1)		313 Chemical		Threshold	Based on
Section 313	(Weight %)		(lbs)		for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.30	0.30	1,329	1,981	N	N
Cyanide Compounds					N	N
Glycol Ethers	6.90	6.90	30,577	45,562	Y	Y
Ethylbenzene					Y	N
Formaldehyde	0.0005	0.0005	2	3	N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.30	0.30	1,329	1,981	Y	N
Naphthalene	0.50	0.50	2,216	3,302	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.70	0.70	3,102	4,622	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.50	0.50	2,216	3,302	Y	N
Zinc Compounds	0.0002	0.0002	1	1	Y	N
1,2,4-Trimethylbenzene	5.40	5.40	23,929	35,657	Y	Y
Total			64,701	96,411		

NOTES

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

- Section 313 Reporting -

Valspar PMA0327 - Backer

2001

2000

Processed/Used (gals):

46,541

44,211

Density (lb/gal):

10.08

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

Section 313 Chemicals
Contained in Coil Coating Line Supplies

			Quantity(a) of		Exceeds	Reportable
	Concentration(1)		313 Chemical		Threshold	Based on
Section 313	(Weigh	nt %)	(lbs)		for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.20	0.20	938	891	N	N
Cyanide Compounds					N	N
Glycol Ethers	2.40	2.40	11,259	10,696	Y	Y
Ethylbenzene					Y	N
Formaldehyde	0.0005	0.0005	2	2		N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	5.40	5.40	25,333	24,065		Y
Naphthalene	0.20	0.20	938	891	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.0003	0.0003	2	2		N
Sulfuric Acid					N	N
Toluene	0.0003	0.0003	2		N	N
Xylene	0.50	0.50	2,346	2,228		N
Zinc Compounds					Y	N
I,2,4-Trimethylbenzene	4.80	4.80	22,518			Y
Total			63,338	60,167		

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

Valspar SPR0062 - Barn Red

2001

2000

- Section 313 Reporting -

Processed/Used (gals):

10,750 9.99 22,388

Density (lb/gal):

Threshold (lbs)

Volatiles:

10,000

Section 313 Chemicals Contained in Coil Coating Line Supplies

onvolatiles: 25,000

			Quantity(a) of		Exceeds	Reportable
	Concentration(1)		313 Chemical		Threshold	Based on
Section 313	(Weig		(lbs)		for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.40	0.40	430	895	N	N
Cyanide Compounds					N	N
Glycol Ethers	4.30	4.30	4,618	9,617	Y	Y
Ethylbenzene	0.0004	0.0004	0	1	Y	N
Formaldehyde	0.10	0.10	107	224	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.50	0.50	537	1,118	Y	N
Naphthalene	0.80	0.80	859	1,789	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.70	0.70	752	1,566	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.90	0.90	967	2,013	Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	7.50	7.50	8,054	16,774	Y	Y
Total			16,324	33,997		

NOTES

(1)Concentrations from MSDS supplied by Valspar Corporation.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

Valspar SPB0084 - Brown

2001

2000

- Section 313 Reporting -

Processed/Used (gals):

8,495

9,771

Density (lb/gal):

9.86 Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

Section 313 Chemicals
Contained in Coil Coating Line Supplies

				Quantity(a) of		Reportable
	Concentration(1)		313 Chemical		Threshold	Based on
Section 313	(Weigh	(Weight %)		(lbs)		De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.30	0.30	251	289	N	N
Cyanide Compounds					N	N
Glycol Ethers	3.10	3.10	2,597	2,987	Y	Y
Ethylbenzene	0.0004	0.0004	0	0	Y	N
Formaldehyde	0.10	0.10	84	96	N	Y
Hydrochloric Acid					. N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.50	0.50	419	482	Y	N
Naphthalene	0.80	0.80	670	771	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.70	0.70	586	674	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.90	0.90	754	867	Y	N
Zinc Compounds	1.90	1.90	1,591	1,830	Y	Y
1,2,4-Trimethylbenzene	7.00	7.00	5,863	6,744	Y	Y
Total			12,816	14,741		

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Valspar SPA0056 - Pewter Gray

2001

2000 6,114

Processed/Used (gals):

7,933

Density (lb/gal):

10.19

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

			<u></u>				
			Quantit	y(a) of	Exceeds	Reportable	
	Concentration(1)		313 Chemical		Threshold	Based on	
Section 313	(Weig	ht %)	(lt	os)	for Facility	De-Minimis	
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)	
Ammonia					N	N	
Arsenic Compounds					N	N	
Cadmium Compounds					N	N	
Chlorine					N	N	
Chromium Compounds					Y	N	
Copper Compounds					N	N	
Cumene	0.30	0.30	243	187	N	N	
Cyanide Compounds					N	N	
Glycol Ethers	2.90	2.90	2,344	1,807	Y	Y	
Ethylbenzene	0.0003	0.0003	0	0	Y	N	
Formaldehyde	0.10	0.10	81	62	N	Y	
Hydrochloric Acid					N	N	
Hydrogen Fluoride					N	N	
Lead Compounds					N	Y	
Manganese Compounds					N	N	
Methyl Ethyl Ketone					N	N	
Methyl IsoButyl Ketone					N	N	
Molybdenum Trioxide					N	N	
n-Butyl Alcohol	0.50	0.50	404	312	Y	N	
Naphthalene	0.80	0.80	647	498	Y	N	
Nickel Compounds					N	N ·	
Nitric Acid					N	N	

0.60

0.80

0.80

6.70

0.60

0.80

0.80

6.70

485

647

647

5,416

10,913

374

498

498

4,174

8,411

N

N

N

Y

Y

Y

N

N

N

N

N

Y

Total NOTES

(1) Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

sec-Butyl Alcohol

Zinc Compounds

1,2,4-Trimethylbenzene

Sulfuric Acid

Toluene

Xylene

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Valspar SPG0074 - Evergreen

2001

2000

Processed/Used (gals):

19,644

19,209

Density (lb/gal):

10.0

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

			Quantity(a) of		Exceeds	Reportable
	Concentra	tion(1)	313 Chemical		Threshold	Based on
Section 313	(Weigh	t %)	(lbs	s)	for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds	12.20	12.20	23,966	23,435	Y	Y
Copper Compounds					N	N
Cumene	0.30	0.30	589	576	N	N
Cyanide Compounds					N	N
Glycol Ethers	3.60	3.60	7,072	6,915	Y	Y
Ethylbenzene	0.0004	0.0004	1	1	Y	N
Formaldehyde	0.10	0.10	196	192	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.40	0.40	786	768	Y	N
Naphthalene	0.90	0.90	1,768	1,729	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.60	0.60	1,179	1,153	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.80	0.80	1,572	1,537	Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	6.20	6.20	12,179	11,910	Y	Y
Total			49,307	48,215		

NOTES

(1) Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT** Valspar SPD0074 - Beige - 2001 SARA Title III -2001 2000 Processed/Used (gals): - Section 313 Reporting -8,585 12,797 Density (lb/gal): 11.74 Threshold (lbs) Section 313 Chemicals Volatiles: 10,000 Contained in Coil Coating Line Supplies 25,000 onvolatiles: Quantity(a) of Reportable Exceeds Concentration(1) 313 Chemical Threshold Based on (Weight %) De-Minimis Section 313 (lbs) for Facility 2001 2000 2001 2000 Chemical (Y or N) (Y or N) N N Ammonia Arsenic Compounds N N Cadmium Compounds N N Chlorine N N Y Chromium Compounds N N N Copper Compounds Cumene 0.30 0.30 302 451 N N Cyanide Compounds N N 5.70 5.70 5,745 8,563 Ÿ Y Glycol Ethers Ethylbenzene Y N Formaldehyde 0.0005 0.0005 N N Hydrochloric Acid N N Hydrogen Fluoride N N Y Lead Compounds N Manganese Compounds 0.0003 0.0003 N N N N Methyl Ethyl Ketone Methyl IsoButyl Ketone N N Molybdenum Trioxide N \overline{N} Y N n-Butyl Alcohol Naphthalene 0.60 0.60 605 901 Y N N N Nickel Compounds N N Nitric Acid 0.70 0.70 sec-Butyl Alcohol 706 1,052 N N N N Sulfuric Acid Toluene N N 901 0.60 0.60 605 Y N Xylene 0.70 0.70 706 1,052 Y N Zinc Compounds 1,2,4-Trimethylbenzene 5.80 5.80 5,846 8,714 Y Y 14,514 21,635 Total NOTES (1) Concentrations from MSDS supplied by Valspar Corporation. (2)Total Processed x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Valspar SPD0073 - Rawhide/Tan

2001 2000 3,064

4,674

10.53

Density (lb/gal):

Volatiles:

Threshold (lbs)

Processed/Used (gals):

10,000 25,000

onvolatiles:

			Ouantity(a) of Exceed				
		Concentration(1)		Quantity(a) of 313 Chemical		Reportable	
	Concenti					Based on	
Section 313	(Weig	tht %)	(lb	-,	for Facility	De-Minimis	
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)	
Ammonia					N	N	
Arsenic Compounds					N	N	
Cadmium Compounds					N	N	
Chlorine					N	N	
Chromium Compounds					Y	N	
Copper Compounds					N	N	
Cumene	0.30	0.30	148	97	N	N	
Cyanide Compounds					N	N	
Glycol Ethers	4.00	4.00	1,969	1,291	Y	Y	
Ethylbenzene	0.0001	0.0001	0	0	Y	N	
Formaldehyde	0.10	0.10	49	32	N	Y	
Hydrochloric Acid					N	N	
Hydrogen Fluoride					N	N	
Lead Compounds				-	N	Y	
Manganese Compounds					N	N	
Methyl Ethyl Ketone					N	N	
Methyl IsoButyl Ketone					N	N	
Molybdenum Trioxide					N	N	
n-Butyl Alcohol	0.40	0.40	197	129	Y	N	
Naphthalene	0.70	0.70	345	226	Y	N	
Nickel Compounds					N	N	
Nitric Acid					N	N	
sec-Butyl Alcohol	1.00	1.00	492	323	N	Y	
Sulfuric Acid					N	N	
Toluene					N	N	
Xylene	0.70	0.70	345	226	Y	N	
Zinc Compounds	3.50	3.50	1,723	1,129		Y	
1,2,4-Trimethylbenzene	7.00	7.00	3,445		Y	Y	
Total			8,712	5,711			

NOTES

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

- Section 313 Reporting -

Valspar SPD0126 - Sandstone

2001

2000 5,495

Processed/Used (gals):

5,842

10.99

Density (lb/gal):

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

Section 313 Chemicals
Contained in Coil Coating Line Supplies

			Quantity(a) of		Exceeds	Reportable
	Concentra	Concentration(1)		313 Chemical		Based on
Section 313	(Weigh	. ,	(lbs	ŀ	Threshold for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia	2001	2000	2001	2000	N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N N
Chlorine					N	N
Chromium Compounds	2.50	2.50	1,605	1,510	Y	Y
Copper Compounds	2.50		- 1,000	1,510	N	N
Cumene	0.30	0.30	193	181	N	N
Cyanide Compounds		0.50			N	N
Glycol Ethers	3.80	3.80	2,440	2,295	Y	Y
Ethylbenzene	0.0004	0.0004	0	0	Y	N
Formaldehyde	0.10	0.10	64	60	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds	0.50	0.50	321	302	N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.40	0.40	257	242	Y	N
Naphthalene	0.80	0.80	514	483	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.80	0.80	514	483	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.70	0.70	449	423	Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	5.40	5.40	3,467	3,261	Y	Y
Total			9,823	9,240		

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Valspar SPA0085 - Quaker Gray

2001

2000

Processed/Used (gals):

5,202

3,027

Density (lb/gal):

10.09 Threshold (lbs)

10,000

Volatiles:

onvolatiles:

25,000

		ļ				
			Quantity		Exceeds	Reportable
	Concentra	tion(1)	313 Chemical		Threshold	Based on
Section 313	(Weigh	it %)	(lbs	s)	for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia		T			N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.30	0.30	157	92	N	N
Cyanide Compounds					N	N
Glycol Ethers	2.40	2.40	1,260	733	Y	Y
Ethylbenzene	0.0004	0.0004	0	0	Y	N
Formaldehyde	0.10	0.10	52	31	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.40	0.40	210	122	Y	N
Naphthalene	0.80	0.80	420	244	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.60	0.60	315	183	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.80	0.80	420	244	Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	6.30	6.30	3,307	1,924	Y	Y
Total			6,141	3,574		

NOTES

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Valspar SPL0083 - Slate Blue

2001

2000 3,296

Processed/Used (gals):

3,973

Density (lb/gal):

10.08

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

,						
			Quantity(a) of		Exceeds	Reportable
	Concentra	tion(1)	313 Chemical		Threshold	Based on
Section 313	(Weigh	nt %)	(lbs)		for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds	1.40	1.40	561	465	Y	Y
Copper Compounds					N	N
Cumene	0.30	0.30	120	100	N	N
Cyanide Compounds					N	N
Glycol Ethers	2.40	2.40	961	797	Y	Y
Ethylbenzene	0.0004	0.0004	0	0	Y	N
Formaldehyde	0.10	0.10	40	33	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N,	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.40	0.40	160	133	Y	N
Naphthalene	0.80	0.80	320	266	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.60	0.60	240	199	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.80	0.80	320	266	Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	6.30	6.30	2,523	2,093	Y	Y
Total			5,246	4,352		

NOTES

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -- Section 313 Reporting -

Processed/Used (gals):

Valspar SPB0109 - Ant. Brown

2001 2,104

2000 2,906

Density (lb/gal):

9.85

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

Section 313 Chemicals
Contained in Coil Coating Line Supplies

			Quantit	y(a) of	Exceeds	Reportable
	Concent	ration(1)	313 Chemical (lbs)		Threshold	Based on
Section 313	(Weig	ht %)			for Facility	De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.30	0.30	62	86	N	N
Cyanide Compounds					N	N
Glycol Ethers	4.70	4.70	974	1,345	Y	Y
Ethylbenzene	0.0004	0.0004	0	0	Y	N
Formaldehyde	0.10	0.10	21	29	N	Y
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds				-	N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	0.40	0.40	83	114	Y	N
Naphthalene	0.80	0.80	166	229	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.70	0.70	145	200	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	0.80	0.80	166	229	Y	N
Zinc Compounds	5.60	5.60	1,161	1,603	Y	Y
1,2,4-Trimethylbenzene	6.30	6.30	1,306	1,803	Y	Y
Total			4,083	5,638		

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Valspar PMA0895 - Roof Deck

2001

2000

Processed/Used (gals):

7,218

57,876

Density (lb/gal):

10.12

Threshold (lbs)

Volatiles:

10,000

onvolatiles:

25,000

Section 313 Chemicals
Contained in Coil Coating Line Supplies

			Quantity(a) of		Exceeds	Reportable
	Concentr	Concentration(1) (Weight %)		313 Chemical (lbs)		Based on
Section 313	(Weigl					De-Minimis
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)
Ammonia					N	N
Arsenic Compounds					N	N
Cadmium Compounds					N	N
Chlorine		1			N	N
Chromium Compounds					Y	N
Copper Compounds					N	N
Cumene	0.20	0.20	146	1,171	N	N
Cyanide Compounds					N	N
Glycol Ethers	6.70	6.70	4,894	39,242	Y	Y
Ethylbenzene	0.30	0.30	219	1,757	Y	Y
Formaldehyde	0.0004	0.0004	0	2	N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds					N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum Trioxide					N	N
n-Butyl Alcohol	1.20	1.20	877	7,028	Y	Y
Naphthalene	0.60	0.60	438	3,514	Y	N
Nickel Compounds					N	N
Nitric Acid					N	N
sec-Butyl Alcohol	0.0004	0.0004	0	2	N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene	1.70	1.70	1,242	9,957	Y	Y
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene	4.60	4.60	3,360	26,942	Y	Y
Total			11,177	89,617		

(1) Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

Section 313 Chemicals

Contained in Coil Coating Line Supplies

Valspar PMW1704

2001

2000

Processed/Used (gals):

433

2,260

Density (lb/gal):

11.77

Threshold (lbs)

Volatiles:

10,000

Nonvolatiles:

25,000

			,		
		Quantity(a) of		Exceeds	Reportable
*		313 Che	emical	Threshold	Based on
Section 313	Concentration (1)	(lbs	s)	for Facility	De-Minimis
Chemical	(Weight %)	2001	2000	(Y or N)	(Y or N)
Ammonia				N	N
Arsenic Compounds				N	N
Cadmium Compounds				N	N
Chlorine				N	N
Chromium Compounds				Y	N
Copper Compounds				N	N
Cumene				N	N
Cyanide Compounds				N	N
Glycol Ethers	10.60	540	2,820	Y	Y
Ethylbenzene	0.20	10	53	Y	Y
Formaldehyde	0.0002	0	0	N	N
Hydrochloric Acid				N	N
Hydrogen Fluoride				N	N
Lead Compounds				N	Y
Manganese Compounds				N	N
Methyl Ethyl Ketone				N	N
Methyl IsoButyl Ketone				N	N
Molybdenum Trioxide				N	N
n-Butyl Alcohol	0.50	25	133	Y	N
Naphthalene	1.70	87	452	Y	Y
Nickel Compounds				N	N
Nitric Acid				N	N
sec-Butyl Alcohol				N	N
Sulfuric Acid				N	N
Toluene	0.40	20	106	N	N
Xylene	0.90	46	239	Y	N
Zinc Compounds				Y	N
1,2,4-Trimethylbenzene	0.50	25	133	Y	N
Total		754	3,937		

NOTES

(1)Concentrations from MSDS supplied by Valspar Corporation.

FORMULAS

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin
Section 313	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic
Chemical	E-1388	E-7949	P-9810	E-2420	E-2421	E-2489	E-2583	SW5X32253	UY9R24235A
	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)
Ammonia									
Arsenic Compounds									
Cadmium Compounds									
Chlorine									
Chromium Compounds									31
Copper Compounds									
Curnene				362					
Cyanide Compounds									
Glycol Ethers	389,975	8,291	69,089	6,760		16,424	13	119	18
Ethylbenzene	36,109	1,382	19,810	5,673	81,238	3,285			12
Formaldehyde			4,953						
Hydrochloric Acid									
Hydrogen Fluoride									
Lead Compounds					•				
Manganese Compounds									
Methyl Ethyl Ketone									
Methyl IsoButyl Ketone									
Molybdenum Trioxide									
n-Butyl Alcohol		6,119	37,145	75,442	81,238	32,848	75		
Naphthalene .	144,435	4,343	49,526	21,245		16,424	30		
Nickel Compounds									
Nitric Acid									
sec-Butyl Alcohol									
Sulfuric Acid									
Toluene				181					
Xylene	144,435	5,725	56,955	24,745	81,238	16,424	30		57
Zinc Compounds	317,758		29,406						
1,2,4-Trimethylbenzene				9,717	81,238		18	81	61
Totals	1,032,712	25,860	266,884	144,125	324,951	85,406	165	200	185

WORKSHEET B-35 (continued)

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

						Coatings					
											
Section 313 Chemical	Valspar PTY0016 (lbs)	Valspar SPW0040 (lbs)	Valspar PMA0327 (lbs)	Valspar SPR0062 (lbs)	Valspar SPB0084 (lbs)	Valspar SPA0056 (lbs)	Valspar SPG0074 (lbs)	Valspar SPD0074 (lbs)	Valspar SPD0073 (lbs)	Valspar SPD0126 (lbs)	Valspar SPA0085 (lbs)
Ammonia	(103)	(103)	(103)	(103)	(103)	(103)	(103)	(103)	(103)	(103)	(103)
Arsenic Compounds	<u> </u>										
Cadmium Compounds											
Chlorine											
Chromium Compounds	98,575						23,435			1,510	
Copper Compounds	78,373						25,455			1,510	
Cumene	620	1,981	891	895	289	187	576	451	97	181	92
Cyanide Compounds	- 020	1,701	97.	370	207	107	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
Glycol Ethers	82,456	45,562	10,696	9,617	2,987	1,807	6,915	8,563	1,291	2,295	733
Ethylbenzene	32,430	45,502	10,070	1	0	0	1	0,505	0,251	0	0
Formaldehyde		3	2	224	96	62	192	1	32	60	31
Hydrochloric Acid											
Hydrogen Fluoride											
Lead Compounds											
Manganese Compounds								0		302	
Methyl Ethyl Ketone											
Methyl IsoButyl Ketone				·							
Molybdenum Trioxide											
n-Butyl Alcohol		1,981	24,065	1,118	482	312	768		129	242	122
Naphthalene	7,440	3,302	891	1,789	771	498	1,729	901	226	483	244
Nickel Compounds											
Nitric Acid											
sec-Butyl Alcohol		4,622	2	1,566	674	374	1,153	1,052	323	483	183
Sulfuric Acid											
Toluene			1								
Xylene	1,860	3,302	2,228	2,013	867	498	1,537	901	226	423	244
Zinc Compounds		l			1,830	498		1,052	1,129		
1,2,4-Trimethylbenzene	8,680	35,657	21,391	16,774	6,744	4,174	11,910	8,714	2,258	3,261	1,924
Totals	199,633	96,411	60,167	33,997	14,741	8,411	48,215	21,635	5,711	9,240	3,574

WORKSHEET B-35 (continued)

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

		<u> </u>			Co	atings (continue	:d)					
Section 313 Chemical	Valspar SPL0083 (lbs)	Valspar PMW0674 (ibs)	Valspar SPA0057 (lbs)	Valspar SPB0109 (1bs)	Valspar PMA0895 (lbs)	Valspar SPA0134 (ibs)	Valspar SPD0157 (lbs)	Nitric Acid (lbs)	Valspar SPW0203 (lbs)	Valspar PMW1704 (lbs)	Valspar PMY0302 (lbs)	Total Quantity (lbs)
Ammonia												
Arsenic Compounds												
Cadmium Compounds												
Chlorine												
Chromium Compounds	465											124,023
Copper Compounds												
Cumene	100			86	1,171							7,978
Cyanide Compounds								-				
Glycol Ethers	797			1,345	39,242					2,820		707,814
Ethylbenzene	0			0	1,757					53		149,32
Formaldehyde	33			29	2					0		5,720
Hydrochloric Acid												
Hydrogen Fluoride												
Lead Compounds												
Manganese Compounds												302
Methyl Ethyl Ketone												
Methyl IsoButyl Ketone												
Molybdenum Trioxide												
n-Butyl Alcohol	133			114	7,028					133		269,494
Naphthalene	266			229	3,514					452		258,739
Nickel Compounds												
Nitric Acid												
sec-Butyl Alcohol	199			200	2							10,833
Sulfuric Acid												
Toluene										106		289
Xylene	266			229	9,957					239		354,399
Zinc Compounds				1,603								353,278
1,2,4-Trimethylbenzene	2,093			1,803	26,942					133		243,574
Totals	4,352	0	0	5,638	89,617	0	0	0	0	3,937	0	2,485,769

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

	Coatings						Coatings (continued)					
	Yenkin	Yenkin	Yenkin	Yenkin									
Section 313	Majestic	Majestic	Majestic	Majestic	Valspar	Valspar	Valspar						
Chemical	E-1410	E-1388	E-7949	P-9810	E-2420	E-2421	E-2489	E-2583	SW5X32253	UY9R24235A	PTY0016	SPW0040	PMA0327
	(lbs)	(lbs)	(lbs)	(ibs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)
Ammonia													
Arsenic Compounds													
Cadmium Compounds													
Chlorine													
Chromium Compounds											94,554		
Copper Compounds													
Cumene											595	1,329	938
Cyanide Compounds													
Glycol Ethers		32,110		6,233			7,929				79,092	30,577	11,259
Ethylbenzene		2,973		1,787		48,437	1,586				2		
Formaldehyde				447								2	7
Hydrochloric Acid													
Hydrogen Fluoride													
Lead Compounds													
Manganese Compounds													
Methyl Ethyl Ketone													
Methyl IsoButyl Ketone													
Molybdenum Trioxide													
n-Butyl Alcohol				3,351		48,437	15,857					1,329	25,333
Naphthalene		11,893		4,468			7,929				7,136	2,216	938
Nickel Compounds													
Nitric Acid													
sec-Butyl Alcohol												3,102	2
Sulfuric Acid													
Toluene													2
Xylene		11,893		5,138		48,437	7,929				1,784	2,216	2,346
Zinc Compounds		26,164		2,653								1	
1,2,4-Trimethylbenzene						48,437					8,325	23,929	22,518
Totals	0	85,032	0	24,078	0	193,749	41,229	0	0	0	191,488	64,701	63,338

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

	T						Coati	ngs (continu	ued)						
	1				T			go (oontan)							
Section 313	Valspar	Valspar	Valspar	Valspar	Vaispar	Valspar	Valspar	Valspar	Valspar	Valspar	Valspar	Valspar	Valspar	Valspar	Total
Chemical	SPR0062 (lbs)	SPB0084 (lbs)	SPA0056 (lbs)	SPG0074 (lbs)	SPD0074 (lbs)	SPD0073 (lbs)	SPD0126 (lbs)	SPA0085 (lbs)	SPL0083 (lbs)	SPB0109 (lbs)	PMA0895 (lbs)	SPW0203 (lbs)	PMW1704 (lbs)	PMY0302 (lbs)	Quantity (lbs)
Ammonia															
Arsenic Compounds															
Cadmium Compounds															
Chlorine															
Chromium Compounds				23,966			1,605		561					3,800	124,485
Copper Compounds															39
Cumene	430	251	243	589	302	148	193	157	120	62	146				5,780
Cyanide Compounds															
Glycol Ethers	4,618	2,597	2,344	7,072	5,745	. 1,969	2,440	1,260	961	974	4,894		540		205,835
Ethylbenzene	0	0	0	1		0	0	0	0	0	219		10	51	55,126
Formaldehyde	107	84	81	196	0	49	64	52	40	21	0		0	-	1,197
Hydrochloric Acid															
Hydrogen Fluoride															
Lead Compounds								·	***						
Manganese Compounds					0		321	· · · · · · · · · · · · · · · · · · ·							321
Methyl Ethyl Ketone															0
Methyl IsoButyl Ketone															0
Molybdenum Trioxide															
n-Butyl Alcohol	537	419	404	786		197	257	210	160		877	1,967	25	· · · · · · · · · ·	102,226
Naphthalene	859	670	647	1,768	605	345	514	420	320	166	438	1,389	87	668	43,928
Nickel Compounds															
Nitric Acid															
sec-Butyl Alcohol	752	586	485	1,179	706	492	514	315	240	145	0				8,739
Sulfuric Acid															
Toluene													20		22
Xylene	967	754	647	1,572	605	345	449	420	320		1,242		46		88,039
Zinc Compounds		1,591	647		706	1,723				1,161					35,287
1,2,4-Trimethylbenzene	8,054	5,863	5,416	12,179	5,846	3,445	3,467	3,307	2,523		3,360	463	25		164,251
Totals	16,324	12,816	10,913	49,307	14,514	8,712	9,823	6,141	5,246	4,083	11,177	3,818	754	6,393	835,277

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Coil Coating Line Supplies in Greater Than De-Minimis Concentrations

						Coatings (continued)					
	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin	Yenkin			
Section 313	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Majestic	Valspar	Valspar	Valspar
Chemical	E-1388	E-7949	P-9810	E-2420	E-2421	E-2489	E-2583	SW5X32253	UY9R24235A	PTY0016	SPW0040	PMA0327
	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(ibs)
Ammonia												
Arsenic Compounds												
Cadmium Compounds												
Chlorine												
Chromium Compounds										94,554		
Copper Compounds												
Cumene												
Cyanide Compounds												
Glycol Ethers	32,110		6,233			7,929				79,092	30,577	11,259
Ethylbenzene	2,973		1,787		48,437	1,586						
Formaldehyde			447									
Hydrochloric Acid												
Hydrogen Fluoride												
Lead Compounds												
Manganese Compounds												
Methyl Ethyl Ketone												
Methyl IsoButyl Ketone												
Molybdenum Trioxide								L				
n-Butyl Alcohol			3,351		48,437	15,857						25,333
Naphthalene	11,893		4,468			7,929				7,136		
Nickel Compounds												
Nitric Acid												
sec-Butyl Alcohol												
Sulfuric Acid												
Toluene												
Xylene	11,893		5,138		48,437	7,929						
Zinc Compounds	26,164		2,653									
1,2,4-Trimethylbenzene					48,437					8,325	23,929	22,518
Totals	85,032	0	24,078	0	193,749	41,229	0	0	0	189,108	54,506	59,111

WORKSHEET B-37 (continued)

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Coil Coating Line Supplies In Greater than De Minimis Concentrations

							Coati	ngs (continu	ued)						
Section 313 Chemical	Valspar SPR0062 (lbs)	Valspar SPB0084 (lbs)	Valspar SPA0056 (lbs)	Valspar SPG0074 (lbs)	Valspar SPD0074 (lbs)	Valspar SPD0073 (lbs)	Valspar SPD0126 (lbs)	Valspar SPA0085 (lbs)	Valspar SPL0083 (lbs)	Valspar SPB0109 (lbs)	Valspar PMA0895 (lbs)	Valspar SPW0203 (lbs)	Valspar PMW1704 (lbs)	Valspar PMY0302 (lbs)	Total Quantity (lbs)
Ammonia															
Arsenic Compounds															
Cadmium Compounds															
Chlorine															
Chromium Compounds				23,966			1,605		561					3,800	124,485
Copper Compounds															
Cumene															
Cyanide Compounds															
Glycol Ethers	4,618	2,597	2,344	7,072	5,745	1,969	2,440	1,260	961	974	.,		540		205,561
Ethylbenzene											219		10	51	
Formaldehyde	107	84	81	196		49	64	52	40	21	` .				1,192
Hydrochloric Acid															
Hydrogen Fluoride															
Lead Compounds															
Manganese Compounds	·														
Methyl Ethyl Ketone															
Methyl IsoButyl Ketone															
Molybdenum Trioxide															
n-Butyl Alcohol											877			1,464	
Naphthalene												1,389	87	668	33,568
Nickel Compounds															
Nitric Acid															
sec-Butyl Alcohol						492									492
Sulfuric Acid															
Toluene															
Xylene											1,242				74,866
Zinc Compounds		1,591				1,723				1,161					33,934
1,2,4-Trimethylbenzene	8,054	5,863	5,416	12,179	5,846	3,445	3,467	3,307		1,306				411	163,763
Totals	12,780	10,135	7,841	43,413	11,591	7,678	7,576	4,619	4,085	3,461	10,592	3,356	637	6,393	790,270

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Primer Oven Incinerator Emissions Point Source: Incinerator Stack

- 2001 SARA Title III -- Section 313 Reporting - Process:

Coil Coating

Incinerator Efficiency⁽¹⁾:
Incinerator Inlet VOC⁽¹⁾:

94.66 % 3,632 ppm

Threshold:

25,000 lbs

Air Release Sources and Estimates

		г	Quantity ^(a) of	Fuerada	Desertable	Describle	
	VI		313 Chemical	Exceeds	Reportable	Reportable	Dd-bla
	Uncontrolled Emissions (2,3)	Concentration ^(a)		Threshold	Based On	For	Reportable
Section 313	(lbs/yr) (b)	1	Released	for Facility	De-Minimis	Facility	Quantity
Chemical		(Weight %)	(lbs)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia	0			N	Y	N	
Arsenic Compounds	0			N	Y	N	
Cadmium Compounds	0			N	Y	N	
Chlorine	0			N	Y	N	
Chromium Compounds	0			Y	Y	Y	
Copper Compounds	0			N	Y	N	
Cumene	769	3.11E-03	37	N	N	N	
Cyanide Compounds	0			N	Y	N	
Glycol Ethers	27,376	1.11E-01	1,316	Y	N	Y	1,316
Ethylbenzene	7,332	2.97E-02	352	Y	N	Y	352
Formaldehyde	159	6.44E-04	8	N	N	N	
Hydrochloric Acid	0			N	Y	N	
Hydrogen Fluoride	0			N	Y	N	
Lead Compounds	0			N	Y	N	
Manganese Compounds	0			N	Y	N	
Methyl Ethyl Ketone	0			N	Y	N	
Methyl IsoButyl Ketone	0			N	Y	N	
Molybdenum Trioxide	0			N	Y	N	
n-Butyl Alcohol	13,596	5.50E-02	653	Y	N	Y	653
Naphthalene	5,842	2.36E-02	281	Y	N	Y	281
Nickel Compounds	0	,		N	Y	N	
Nitric Acid	0	,		N	Y	N	
sec-Butyl Alcohol	1,162	4.70E-03	56	N	N	N	
Sulfuric Acid	0			N	Y	N	
Toluene	3	1.18E-05	0	N	N	N	
Xylene	11,709	4.74E-02	563	Y	N	Y	563
Zinc Compounds	0	,		Y	Y	Y	
1,2,4-Trimethylbenzene	21,845	8.84E-02	1,050	.]	N	Y	1,050
Totals	89,794		4,316		1400		4,215

NOTES

FORMULAS

⁽¹⁾Based On Stack Tests Conducted On 3/11/92 By Hemeon Associates.

⁽²⁾Assumes 100% Release and 90% Capture Of Volatile Compounds Contained In Primer Line Supplies by Primer Oven Incinerator.

⁽³⁾Primer Line Supplies Usage Estimated By Beech Bottom Plant Personnel To Be 13.3% Of Total Coil Coating Line Supplies.

⁽a) Uncontrolled Emissions x (1-Incinerator Efficiency/100) x % Captured by Incinerator (0.90).

⁽b) lbs Chemical in Total Qty of Coatings x 0.133

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Finishing Oven Incinerator Emissions
Point Source: Incinerator Stack

2001 CAPA Title III

- 2001 SARA Title III -

- Section 313 Reporting -

Process:

Coil Coating

Incinerator Efficiency(1):

90.00 %

Incinerator Inlet VOC(1):

2,658 ppm

Threshold:

25,000 lbs

Air Release Sources and Estimates

		Quantity (a) of	Exceeds	Reportable	Reportable	
	Uncontrolled	313 Chemical	Threshold	Based On	For	Reportable
Section 313	Emissions (2,3)	Released	for Facility	De-Minimis	Facility	Quantity
Chemical	(lbs/yr) ^(b)	(lbs)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia	0		N	Y	N	
Arsenic Compounds	0		N	Y	N	
Cadmium Compounds	0		N	Y	N	
Chlorine	0		N	Y	N	
Chromium Compounds	0		Y	Y	Y	
Copper Compounds	0		N	Y	N	
Cumene	5,011	451	N	N	N	
Cyanide Compounds	0		N	Y	N	
Glycol Ethers	178,459	16,061	Y	N	Y	16,061
Ethylbenzene	47,794	4,301	Y	N	Y	4,301
Formaldehyde	1,038	93	N	N	N	
Hydrochloric Acid	0		N	Y	N	
Hydrogen Fluoride	0		N	Y	N	
Lead Compounds	0		N	Y	N	
Manganese Compounds	0		N	Y	N	
Methyl Ethyl Ketone	0		N	Y	N	
Methyl IsoButyl Ketone	0		N	Y	N	
Molybdenum Trioxide	0		N	Y	N	
n-Butyl Alcohol	88,630	7,977	Y	N	Y	7,977
Naphthalene	38,086	3,428	Y	N	Y	3,428
Nickel Compounds	0		N	Y	N	
Nitric Acid	0		N	Y	N	
sec-Butyl Alcohol	7,577	682	N	N	N	
Sulfuric Acid	0		N	Y	N	
Toluene	19	2	N	N	N	
Xylene	76,330	6,870		N	Y	6,870
Zinc Compounds	0		Y	Y	Y	
1,2,4-Trimethylbenzene	142,406		Y	N	Y	12,817
Totals	585,350	52,682		27 6-29		51,453

NOTES

FORMULAS

(a)Uncontrolled Emissions x (1-Incinerator Efficiency/100) x % Captured by Incinerator (0.90).

(b) lbs Chemical in Total Qty of Coatings x 0.867

⁽¹⁾Based On Stack Tests Conducted On 3/11/92 By Hemeon Associates And Best Engineering Judgment.

⁽²⁾Assumes 100% Release and 90% Capture Of Volatile Compounds Contained In Finishing Line Supplies by Finishing Oven Incinerator.

⁽³⁾Finishing Line Supplies Usage Estimated By Beech Bottom Plant Personnel To Be 86.7% Of Total Coil Coating Line Supplies.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Primer Oven Incinerator Emissions

Fugitive Emissions: Surface Coating and Quenching

- 2001 SARA Title III -

- Section 313 Reporting -

Process:

Coil Coating

Incinerator Capture Efficiency (1):

0.00 %

Incinerator Inlet VOC (1):

3,632 ppm

Threshold:

25,000 lbs

Air Release Sources and Estimates

		Quantity (a) of	Exceeds	Reportable	Reportable	
	Uncontrolled	313 Chemical	Threshold	Based On	For	Do-ostoblo
O	Emissions (2,3)					Reportable
Section 313	(lbs/yr) (b)	Released	for Facility	De-Minimis	Facility	Quantity
Chemical		(lbs)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia	0		N	Y	N	
Arsenic Compounds	0		N	Y	N	
Cadmium Compounds	0		N	Y	N	
Chlorine	0		N	Y	N	
Chromium Compounds	0		Y	Y	Y	
Copper Compounds	0		N	Y	N	
Cumene	769	7 7	N	N	N	
Cyanide Compounds	0		N	Y	N	
Glycol Ethers	27,376	2,738	Y	N	Y	2,738
Ethylbenzene	7,332	733	Y	N	Y	733
Formaldehyde	159	16	N	N	N	
Hydrochloric Acid	0		N	Y	N	
Hydrogen Fluoride	0		N	Y	N .	
Lead Compounds	0		N	Y	N	
Manganese Compounds	0		N	Y	N	
Methyl Ethyl Ketone	0		N	Y	N	
Methyl IsoButyl Ketone	0		N	Y	N	
Molybdenum Trioxide	0	•	N	Y	N	
n-Butyl Alcohol	13,596	1,360	Y	N	Y	1,360
Naphthalene	5,842	584	Y	N	Y	584
Nickel Compounds	0		N	Y	N	
Nitric Acid	0		N	Y	N	
sec-Butyl Alcohol	. 1,162	116	N	N	N	
Sulfuric Acid	0		N	Y	N	
Toluene	3	0	N	N	N	
Xylene	11,709	1,171	Y	N	Y	1,171
Zinc Compounds	0		Y	Y	Y	
1,2,4-Trimethylbenzene	21,845		Y	N	Y	2,185
Totals	89,794	8,979	14			8,770

NOTES

(1)Based On Stack Tests Conducted On 3/11/92 By Hemeon Associates. Incinerator Eff. is zero for fugitive emissions from surface coating & quenching. (2) Assumes 100% Release and 90% Capture Of Volatile Compounds Contained In Primer Line Supplies by Primer Oven Incinerator.

10% of VOCs released are not captured by Primer Oven Incinerator & are emitted as fugitives during surface coating (8%) & quenching (2%) of coils.

(3)Primer Line Supplies Usage Estimated By Beech Bottom Plant Personnel To Be 13.3% Of Total Coil Coating Line Supplies.

FORMULAS

(a)Uncontrolled Emissions x (1-Incinerator Efficiency/100) x % Fugitive Emissions (0.10).

(b) Ibs Chemical in Total Qty of Coatings x 0.133

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Finishing Oven Incinerator Emissions

Fugitive Emissions: Surface Coating and Quenching

- 2001 SARA Title III -- Section 313 Reporting -

Process:

Coil Coating

Incinerator Efficiency (1):

0.00 %

Incinerator Inlet VOC (1):

2,658 ppm

Threshold:

25,000 lbs

Air Release Sources and Estimates

Quantity (a) of Exceeds Reportable Reportable Uncontrolled 313 Chemical Threshold Based On For Reportable Emissions (2,3) Released for Facility De-Minimis Facility Section 313 Quantity (lbs/yr) (b) (lbs) (Y or N) Chemical (Y or N) (Y or N) (lbs) Ammonia N Y N 0 Y Arsenic Compounds N N 0 N Y N Cadmium Compounds 0 N Y Chlorine N Chromium Compounds 0 Y Y Y 0 N Y N Copper Compounds Cumene 5,011 501 N N N Y N Cyanide Compounds N 178,459 17,846 Y N Y 17,846 Glycol Ethers 47,794 4,779 Y N Y 4,779 Ethylbenzene 104 N Formaldehyde 1,038 N N Y Hydrochloric Acid 0 N N 0 Hydrogen Fluoride N Y N 0 N Y Lead Compounds N Manganese Compounds 0 N Y N 0 N Y N Methyl Ethyl Ketone 0 Y N N Methyl IsoButyl Ketone 0 Y Molybdenum Trioxide N N n-Butyl Alcohol 88,630 8,863 Y N Y 8,863 38,086 3,809 Y N Y 3,809 Naphthalene Y Nickel Compounds 0 N N 0 N Y Nitric Acid N sec-Butyl Alcohol 7,577 758 N N N Sulfuric Acid 0 N Y N 19 N Toluene N N 76,330 7,633 Y N Ÿ 7,633 Xylene Zinc Compounds Y Y Y 14,241 Y N Y 1,2,4-Trimethylbenzene 142,406 14,241 57,171 Totals 585,350 58,535

NOTES

- (1)Based On Stack Tests Conducted On 3/11/92 By Hemeon Associates. Incinerator Eff. is zero for fugitive emissions from surface coating & quenching.
- (2) Assumes 100% Release and 90% Capture Of Volatile Compounds Contained In Finishing Line Supplies by Finishing Oven Incinerator.
- 10% of VOCs released are not captured by Finish Oven Incinerator & are emitted as fugitives during surface coating (8%) & quenching (2%) of coils.
- (3) Finishing Line Supplies Usage Estimated By Beech Bottom Plant Personnel To Be 86.7% Of Total Coil Coating Line Supplies.

FORMULAS

- (a) Uncontrolled Emissions x (1-Incinerator Efficiency/100) x % Fugitive Emissions (0.10).
- (b) lbs Chemical in Total Qty of Coatings x 0.867

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Total Air Release Sources and Estimates

		Point S	ources			Fugitive	Sources		Total Air	Releases	Total Air	Releases		
Section 313	Prime	r Line	Finishi	ng Line	Prime	r Line	Finishi	ng Line	Point :	Sources	Fugitive	Sources	Total Air	Releases
Chemical	11	os	il	bs	11	bs	11	bs	1	os	11	os	lt	os
	Released	Reportable	Released	Reportable	Released	Reportable	Released	Reportable	Released	Reportable (1,2)	Released	Reportable (1,2)	Released	Reportable (1,2)
Ammonia														
Arsenic Compounds														
Cadmium Compounds														
Chlorine														
Chromium Compounds														
Copper Compounds														
Cumene	37		451		77		501		488		578		1,066	
Cyanide Compounds														
Glycol Ethers	1,316	1,316	16,061	16,061	2,738	2,738	17,846	17,846	17,377	17,377	20,584	20,584	37,961	37,961
Ethylbenzene	352	352	4,301	4,301	733	733	4,779	4,779	4,654	4,654	5,513	5,513	10,166	10,166
Formaldehyde	8		93		16		104		101		120		221	
Hydrochloric Acid														
Hydrogen Fluoride														
Lead Compounds														
Manganese Compounds														
Methyl Ethyl Ketone														
Methyl IsoButyl Ketone														
Molybdenum Trioxide														
n-Butyl Alcohol	653	653	7,977	7,977	1,360	1,360	8,863	8,863	8,630	8,630	10,223	10,223	18,853	18,853
Naphthalene	281	281	3,428	3,428	584	584	3,809	3,809	3,709	3,709	4,393	4,393	8,101	8,101
Nickel Compounds														
Nitric Acid														
sec-Butyl Alcohol	56		682		116		758		738		874		1,612	
Sulfuric Acid							·							
Toluene	0		2		0		2		2		2		4	
Xylene	563	563	6,870	6,870	1,171	1,171	7,633	7,633	7,432	7,432	8,804	8,804	16,236	16,236
Zinc Compounds														
1,2,4-Trimethylbenzene	1,050	1,050	12,817	12,817	2,185	2,185	14,241	14,241	13,866	13,866	16,425	16,425	30,292	30,292
Totals	4,316	4,215	52,682	51,453	8,979	8,770	58,535	57,171	56,997	55,668	67,514	65,941	124,511	121,609

NOTES

(1)Reported in Section 5.2 of Form Rs.

(2)Component of Section 8.1, Column B, of Form Rs.

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WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

NPDES Outfall 004

- 2001 SARA Title III -

- Section 313 Reporting -

2001

2000

Flow:

0.180

0.133 MGD

Operating Time: Threshold: 365

25,000 lbs

366 days

Water Release Sources and Estimates

			Quantity	(a) of	Exceeds	Reportable	Reportable	2001
	Concentrat	ion (1)	313 Chemica		Threshold	Based On	For	Reportable
Section 313	(Weight	:%)	(lbs)	for Facility	De-Minimis	Facility	Quantity
Chemical	2001	2000	2001	2000	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia					N	N	N	
Arsenic Compounds					N	N	N	
Cadmium Compounds					N	N	N	
Chlorine	1.72E-05	1.72E-05	94	70	N	N	N	
Chromium Compounds	6.00E-07	1.45E-06	3	6	Y	N	Y	
Copper Compounds					N	N	N	
Cumene					N	N	N	
Cyanide Compounds					N	N	N	
Glycol Ethers					Y	N	Y	
Ethylbenzene					Y	N	Y	
Formaldehyde					N	N	N	
Hydrochloric Acid	,				N	N	N	
Hydrogen Fluoride					N	N	N	
Lead Compounds	1.70E-07	4.48E-07	1	2	N	Y	N	
Manganese Compounds	3.00E-05	5.49E-05	164	223	N	N	N	
Methyl Ethyl Ketone					N	N	N	
Methyl IsoButyl Ketone					N	N	N	
Molybdenum Trioxide					N	N	N	
n-Butyl Alcohol					Y	N	Y	
Naphthalene					Y	N	Y	
Nickel Compounds	1.40E-06	3.32E-06	8	13	N	N	N	
Nitric Acid					N	N	N	
sec-Butyl Alcohol					N	N	N	
Sulfuric Acid					N	N	N	
Toluene					N	N	N	
Xylene					Y	N	Y	
Zinc Compounds	3.88E-05	2.00E-05	213	81	Y	N	Y	21
1,2,4-Trimethylbenzene					Y	N	Y	
Totals			483	395				21

(1) Concentrations From 2001 and 2000 Wheeling-Pittsburgh Steel Corporation Data, except Chlorine which is based on historical data. Intake conc. Deducted from Mn. FORMULAS

(a) Flow x Operating Time x Concentration x 8.345 x 10⁴.

WHEELING CORRUGATING CO. **BEECH BOTTOM PLANT**

> - 2001 SARA Title III -- Section 313 Reporting -

> > Other Release

Waste Description: Wastewater Treatment Plant Sludge Disposition: Off-Site Landfill (Northfork Landfill)

Process: Coil Coating

2001

2000

Quantity Generated:

195 1,077 tons

Threshold:

25,000 lbs

Sources and Estimates	2001 Reportable Quantity (lbs)
Section 313 Concentration (1) (Weight %) 313 Chemical (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	Reportable Quantity
Section 313	Quantity
Chemical (Weight %) 2,001 2000 (Y or N) (Y or N) (Y or N) (Y or N) Ammonia N N N N N N N N N N N N N N N N N N	1 '
Ammonia N N N Arsenic Compounds 9.32E-05 0.24 1.30 N N N Cadmium Compounds N N N N N N Chlorine N N N N N N N Chromium Compounds 3.73E-04 0.95 5.22 Y N Y Y N <	(lbs)
Arsenic Compounds 9.32E-05 0.24 1.30 N N N Cadmium Compounds N N N N N N Chlorine N N N N N N Chromium Compounds 3.73E-04 0.95 5.22 Y N Y Copper Compounds 1.20E-03 3.04 16.80 N N N N Cumene N	
Cadmium Compounds N N N N Chlorine N N N N Chromium Compounds 3.73E-04 0.95 5.22 Y N Y Copper Compounds 1.20E-03 3.04 16.80 N N N N Cumene N <t< td=""><td></td></t<>	
Chlorine N N N N Chromium Compounds 3.73E-04 0.95 5.22 Y N Y Copper Compounds 1.20E-03 3.04 16.80 N N N N Cumene N	
Chromium Compounds 3.73E-04 0.95 5.22 Y N Y Copper Compounds 1.20E-03 3.04 16.80 N N N Cumene N N N N N Cyanide Compounds 5.00E-05 0.13 0.70 N N N Glycol Ethers Y N N Y N Y Ethylbenzene Y N N Y N Y Formaldehyde N	
Copper Compounds 1.20E-03 3.04 16.80 N N N Cumene N N N N N Cyanide Compounds 5.00E-05 0.13 0.70 N N N Glycol Ethers Y N N Y N Y Ethylbenzene Y N N Y N Y Formaldehyde N N N N N N N Formaldehyde N	
Cumene N N N Cyanide Compounds 5.00E-05 0.13 0.70 N N N Glycol Ethers Y N Y N Y Ethylbenzene Y N Y N Y Formaldehyde N <t< td=""><td>1</td></t<>	1
Cyanide Compounds 5.00E-05 0.13 0.70 N N N Glycol Ethers Y N Y N Y Ethylbenzene Y N Y N Y Formaldehyde N N N N N N Hydrogen Fluoride N	
Glycol Ethers Y N Y Ethylbenzene Y N Y Formaldehyde N N N N Hydrochloric Acid N N N N Hydrogen Fluoride N N N N Lead Compounds 1.00E-03 2.54 14.00 N Y N Manganese Compounds 6.90E-02 174.92 966.07 N N N N Methyl Ethyl Ketone N N N N N N N Molybdenum Trioxide N <	
Ethylbenzene Y N Y Formaldehyde N N N N Hydrochloric Acid N N N N Hydrogen Fluoride N N N N Lead Compounds 1.00E-03 2.54 14.00 N Y N Manganese Compounds 6.90E-02 174.92 966.07 N N N N Methyl Ethyl Ketone N N N N N N Molybdenum Trioxide N N N N N N Nebyl Alcohol Y N Y N Y Naphthalene Y N N N Nickel Compounds 4.10E-03 10.40 57.41 N N N	
Formaldehyde N N N N Hydrochloric Acid N N N N Hydrogen Fluoride N N N N Lead Compounds 1.00E-03 2.54 14.00 N Y N Manganese Compounds 6.90E-02 174.92 966.07 N N N N Methyl Ethyl Ketone N N N N N N Methyl IsoButyl Ketone N N N N N N Molybdenum Trioxide N N N N N N N-Butyl Alcohol Y N Y N Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N N	0
Hydrochloric Acid	0
Hydrogen Fluoride	
Lead Compounds 1.00E-03 2.54 14.00 N Y N Manganese Compounds 6.90E-02 174.92 966.07 N N N Methyl Ethyl Ketone N N N N Methyl IsoButyl Ketone N N N N Molybdenum Trioxide N N N N n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N	
Manganese Compounds 6.90E-02 174.92 966.07 N N N Methyl Ethyl Ketone N N N N N Methyl IsoButyl Ketone N N N N Molybdenum Trioxide N N N N n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N	
Methyl Ethyl Ketone N N N Methyl IsoButyl Ketone N N N Molybdenum Trioxide N N N N-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N	
Methyl IsoButyl Ketone N N N Molybdenum Trioxide N N N n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N	
Molybdenum Trioxide N N N n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N N	
n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N	
Naphthalene Y N Y Nickel Compounds 4.10E-03 10.40 57.41 N N N	
Nickel Compounds 4.10E-03 10.40 57.41 N N N	0
	0
Nitric Acid N N N	
sec-Butyl Alcohol N N N	
Sulfuric Acid N N N	
Toluene N N N	
Xylene Y N Y	0
Zinc Compounds 1.20E-01 304.20 1680.12 Y N Y	304
1,2,4-Trimethylbenzene 0.00 Y N Y	0
Total 496.40 2741.63	305

NOTES

FORMULAS

(a) Quantity Generated x (1 - (Percent Moisture/100)) x (Concentration/100) x 2,000.

⁽¹⁾ Manganese Concentration From 1990 Wheeling -Pittsburgh Steel Corporation Data. Arsenic, Chromium, and Nickel Concentrations From 1991 Wheeling-Pittsburgh Steel Corporation Data. All other concentrations From 1993 Wheeling-Pittsburgh Steel Corporation Data.

⁽²⁾ De-Minimis values are not applicable to waste streams.

⁽³⁾ Moisture Content from conversations with Wheeling-Pittsburgh Steel Personnel.

WHEELING CORRUGATING CO. Waste Description: Zinc Phosphate Sludge Disposition: Off-Site Landfill (Northfork Landfill) BEECH BOTTOM PLANT - 2001 SARA Title III -- Section 313 Reporting -Process: Coil Coating 2001 2000 Quantity Generated: 26 80 tons Other Release Threshold: 25,000 lbs Percent Moisture (3): Sources and Estimates 10 % Quantity (a) of Exceeds Reportable Reportable 2001 313 Chemical Released Threshold Based On For Reportable Concentration (1) De-Minimis (2) Section 313 (lbs) for Facility Facility Quantity (Weight %) 2001 2000 Chemical (Y or N) (Y or N) (Y or N) (lbs) N N N Ammonia 2.00E-05 0 Arsenic Compounds N N N N N N Cadmium Compounds Chlorine N N N Chromium Compounds 3.00E-03 Y N Y N Copper Compounds N N N N Cumene N 1.00E-04 0 N N N Cyanide Compounds N Glycol Ethers Y Υ Ethylbenzene Y N Y Formaldehyde N N N N N Hydrochloric Acid N Hydrogen Fluoride N N N 7.50E-03 11 N Y N Lead Compounds N Manganese Compounds N N Methyl Ethyl Ketone N N N N N N Methyl IsoButyl Ketone Molybdenum Trioxide N N N Y N n-Butyl Alcohol Y Y N Naphthalene Y Nickel Compounds 1.50E+00 702 2,160 N Υ N Nitric Acid N N N sec-Butyl Alcohol N N N N N Sulfuric Acid N N N N Toluene Y Y ٠N Xylene Zinc Compounds 3.10E+00 1,451 4,464 Υ Y Υ 1,451 Y N Y 1,2,4-Trimethylbenzene Total 2,158 6,639 1,452

NOTES

- (1) Concentrations From 1993 Wheeling-Pittsburgh Steel Corporation Data.
- (2) De-Minimis values are not applicable to waste streams.
- (3) Moisture Content from conversations with Wheeling-Pittsburgh Steel Corporation personnel.

FORMULAS

(a) Quantity Generated x (1 - (Percent Moisture/100)) x (Concentration/100) x 2,000.

Section 313								
- 2001 SARA Title III Section 313 Reporting - Description of Ohio: Soo 1,400 lbs	WHEELING CORRUGATING CO.	Waste Description	Waste Chromis	un from Paint Li	ne Operation			
- Section 313 Reporting - Envirte of Ohio: Envirte of Ohio: 500 1,400 lbs 1,400 lbs	BEECH BOTTOM PLANT	Disposition:	Chemical Oxida	ation/Landfill	-			
Envirie of Ohio:	- 2001 SARA Title III -							
Quantity Disposed: Tareshold: 25,000 lbs	- Section 313 Reporting -				2001	2000		
Color Concentration Conc		E	nvirite of Ohio:		500	1,400	lbs	
Sources and Estimates		Qu	antity Disposed:		500	1,400	lbs	
Section 313	Other Release		Threshold:		25,000	lbs		
Section 313	Sources and Estimates							
Section 313			Quant	ity ^(a) of	Exceeds	Reportable	Reportable	2001
Chemical (Weight %) 2001 2000 (Y or N) (Y or N) (Hos)			313 Chemic	cal Released	Threshold	Based On	For	Reportable
Chemical (Weight %) 2001 2000 (Y or N) (Y or N) (Ibs)	Section 313	Concentration (1)	(1	os)	for Facility	De-Minimis (2)	Facility	Quantity
Ammonia	Chemical	(Weight %)	2001	2000	(Y or N)	(Y or N)	(Y or N)	` '
Arsenic Compounds Cadmium Compounds Cadmium Compounds N N N N N N N N N N N N N N N N N N N	Ammonia							(42)
Cadmium Compounds N								
Chlorine								
Chromium Compounds								
Copper Compounds N Y Edityle Delay De		5.00E-02	0	1				
Cumene N N N Cyanide Compounds N N N Glycol Ethers Y N Y Ethylbenzene Y N Y Formaldehyde N N N Hydrochoric Acid N N N Hydrocyen Fluoride N N N Lead Compounds N N N Manganese Compounds N N N Methyl Ethyl Ketone N N N Methyl IsoButyl Ketone N N N Molybdenum Trioxide N N N n-Butyl Alcohol Y N N n-Butyl Alcohol Y N Y Nickel Compounds N N N North N N N								
Cyanide Compounds N N N N N N N N N N Y N Y N Y N Y N Y N Y N								
Silycol Ethers	····							
Ethylbenzene								
Hydrochloric Acid	Ethylbenzene				Y	N		
Hydrogen Fluoride	Formaldehyde				N	N	N	-
Lead Compounds	Hydrochloric Acid		-		N	N	N	
Manganese Compounds N N N Methyl Ethyl Ketone N N N Methyl IsoButyl Ketone N N N Molybdenum Trioxide N N N N-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds N N N Nitric Acid N N N Nitric Acid N N N Sulfuric Acid N N N Toluene N N N Xylene Y N Y Zinc Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Total 0 1 1	Hydrogen Fluoride				N	N	N	
Methyl Ethyl Ketone N N N Methyl IsoButyl Ketone N N N Molybdenum Trioxide N N N N-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds N N N Nitric Acid N N N Sec-Butyl Alcohol N N N Sulfuric Acid N N N Toluene N N N Xylene Y N Y Zinc Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Total 0 1 1	Lead Compounds				N	Y	N	
Methyl IsoButyl Ketone N N N Molybdenum Trioxide N N N n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds N N N Nitric Acid N N N Nitric Acid N N N Sec-Butyl Alcohol N N N Sulfuric Acid N N N Toluene N N N Xylene Y N Y Zinc Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Total 0 1 1	Manganese Compounds				N	N	N	
Molybdenum Trioxide N N N n-Butyl Alcohol Y N Y Naphthalene Y N Y Nickel Compounds N N N Nitric Acid N N N Nitric Acid N N N Sulfuric Acid N N N Sulfuric Acid N N N Toluene N N N Xylene Y N Y Zinc Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Total 0 1 I I	Methyl Ethyl Ketone				N	N	N	
Naphthalene	Methyl IsoButyl Ketone				N	N	N	
Naphthalene Y N Y Nickel Compounds N N N N Nitric Acid N N N N Sec-Butyl Alcohol N N N N Sulfuric Acid N N N N Toluene N N N N Xylene Y N Y Zine Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Total 0 1 I I	Molybdenum Trioxide				N	. N	N	
Nickel Compounds N N N Nitric Acid N N N sec-Butyl Alcohol N N N Sulfuric Acid N N N Toluene N N N Xylene Y N Y Zinc Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Total 0 1 I I	n-Butyl Alcohol				Y	N	Y	
Nitric Acid N <td< td=""><td>Naphthalene</td><td></td><td></td><td></td><td>Y</td><td>N</td><td>Y</td><td></td></td<>	Naphthalene				Y	N	Y	
Sec-Butyl Alcohol	Nickel Compounds				N	N	N	
Sulfuric Acid	Nitric Acid				N	N	N	
Toluene	sec-Butyl Alcohol				N	N	N	
Xylene Y N Y Zine Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Fotal 0 1 I I	Sulfuric Acid				N	N	N	
Zinc Compounds Y N Y 1,2,4-Trimethylbenzene Y N Y Fotal 0 1 I I	Toluene				N	N	N	
1,2,4-Trimethylbenzene Y N Y Fotal 0 1	Xylene				Y	N	Y	
Total 0 1	Zinc Compounds					N	Y	
	1,2,4-Trimethylbenzene				Y	N	Y	
IOMEO.	Total		0	1				C

NOTES

FORMULAS

(a) Quantity Generated x (Concentration/100).

⁽¹⁾ Concentration estimated based on maximum concentration of hazardous waste classified as D007 (according to "Pollution Control Engineer's Handbook", 1985) multiplied by 100 (per engineering estimate) and divided by 10,000 to convert from mg/l to percent.

⁽²⁾ De-Minimis values are not applicable to waste streams.

WHEELING CORRUGATING CO.	Waste Description	Used Paint Rag	gs/Solids from Pa	aint Line			
BEECH BOTTOM PLANT	Disposition:	Fuels Blending	or Stabilization/I	andfill			
- 2001 SARA Title III -							
- Section 313 Reporting -	1			2001	2000		
	н	lukill Chemical		9,539	11,400	lbs	
	Qu	antity Disposed:		9,539	11,400	lbs	
Other Release	1	Threshold:		25,000	lbs		
Sources and Estimates							
		Quanti	ty ^(a) of	Exceeds	Reportable	Reportable	2001
		313 Chemic	al Released	Threshold	Based On	For	Reportable
Section 313	Concentration (1)	(It	os)	for Facility	De-Minimis (2)	Facility	Quantity
Chemical	(Weight %)	2001	2000	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia				N	N	N	
Arsenic Compounds				N	N	N	
Cadmium Compounds	1.00E-02	1	1	N	N	N	
Chlorine				N	N.	N	
Chromium Compounds	5.00E-02	5	6	Y	N	Y	5
Copper Compounds				N	N	N	
Cumene				N	N	N	
Cyanide Compounds				N	N	N	
Glycol Ethers				Y	N	Y	
Ethylbenzene				Y	N	Y	
Formaldehyde				N	N	N	
Hydrochloric Acid				N	N	N	
Hydrogen Fluoride				N	N	N	
Lead Compounds	5.00E-02	5	6	N	Y	N	
Manganese Compounds				N	N	N	
Methyl Ethyl Ketone	2.00E+00	191	228	N	Y	N	
Methyl IsoButyl Ketone				N	N	N	
Molybdenum Trioxide				N	N	N	
n-Butyl Alcohol				Y	N	Y	
Naphthalene				Y	N	Y	
Nickel Compounds				N	N	N	
Nitric Acid				N	N	N	
sec-Butyl Alcohol				N	N	N	
Sulfuric Acid				N	N	N	
Toluene				N	N	N	
Xylene				Y	N	Y	
Zinc Compounds				Y	N	Y	
1,2,4-Trimethylbenzene				Y	N	Y	
Total		201	241				5

NOTES

FORMULAS

(a) Quantity Generated x (Concentration/100).

⁽¹⁾ Concentrations estimated based on maximum concentrations of hazardous wastes classified as D006, D007, D008 and D035 (according to "Pollution Control Engineer's Handbook",1985) multiplied by 100 (per engineering estimate) and divided by 10,000 to convert from mg/l to percent.

⁽²⁾ De-Minimis values are not applicable to waste streams.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Other Release Sources and Estimates

						Off-Site	Releases							Total Land	
	Wastew	ater Treatmen	t Sludge	Zinc	Phosphate SI	udge	Waste Ch	romium from	Paint Line	Used	Paint Rags/S	olids		Releases	
Section 313	j	(lbs)			(lbs)			(lbs)			(lbs)			(lbs)	
Chemical	Rele	ased	Reportable	Rele	eased	Reportable	Rele	eased	Reportable	Rele	ased	Reportable	Rele	ased	Reportable ⁽¹⁾
	2001	2000	2001	2001	2000	2001	2001	2000	2001	2001	2000	2001	2001	2000	2001
Ammonia															
Arsenic Compounds	0	1		0	0								0	1	
Cadmium Compounds										1	1		1	1	
Chlorine															
Chromium Compounds	i	5	1	1	4	1	0	1	0	5	6	5	7	16	7
Copper Compounds	3	17	-										3	17	
Cumene															
Cyanide Compounds ·	0	1		0	0								0	1	
Glycol Ethers															
Ethylbenzene															
Formaldehyde															
Hydrochloric Acid															,
Hydrogen Fluoride		1													
Lead Compounds	3	14		4	11					5	6		11	31	
Manganese Compounds	175	966											175	966	
Methyl Ethyl Ketone										191	228		191	228	
Methyl IsoButyl Ketone															
Molybdenum Trioxide														:	
n-Butyl Alcohol															
Naphthalene															
Nickel Compounds	10	57		702	2,160								712	2,217	
Nitric Acid															
sec-Butyl Alcohol											1.				
Sulfuric Acid															
Toluene												L			
Xylene															
Zinc Compounds	304	1,680	304	1,451	4,464	1,451							1,755	6,144	1,755
1,2,4-Trimethylbenzene															
Totals	496	2,742	305	2,158	6,639	1,452	0	1	0	201	241	5	2,856	9,622	1,762

NOTES

⁽¹⁾ Reported in Section 6.2 of Form Rs.

⁽²⁾ Component of Section 8.1, Column B, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT - 2001 SARA Title III Section 313 Reporting - Total Releases	To A Rele	ir	To Wa Rele	ter	La	tal nd ases		tal ases
Section 313	lb.	s	lb	s	18	os	ll.	os
Chemical	Released	Reportable	Released	Reportable	Released	Reportable	Released	Reportable(1)
Ammonia								
Arsenic Compounds					0		0	
Cadmium Compounds					1		1	
Chlorine			94				94	
Chromium Compounds			3	3	7	7	11	1
Copper Compounds					3		3	
Cumene	1,066						1,066	
Cyanide Compounds					0		0	
Glycol Ethers	37,961	37,961					37,961	37,96
Ethylbenzene	10,166	10,166					10,166	10,160
Formaldehyde	221						221	
Hydrochloric Acid								
Hydrogen Fluoride							-	
Lead Compounds			1		11		12	
Manganese Compounds			164		175		339	
Methyl Ethyl Ketone					191		191	
Methyl IsoButyl Ketone								
Molybdenum Trioxide								
n-Butyl Alcohol	18,853	18,853					18,853	18,85
Naphthalene	8,101	8,101					8,101	8,10
Nickel Compounds			8		712		720	
Nitric Acid								
sec-Butyl Alcohol	1,612						1,612	
Sulfuric Acid								
Toluene	4						4	
Xylene	16,236	16,236					16,236	16,230
Zinc Compounds			213	213	1,755	1,755	1,968	1,968
1,2,4-Trimethylbenzene	30,292	30,292					30,292	30,292
Totals	124,511	121,609	483	216	2,856	1,762	127,851	123,587

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

SOURCE REDUCTION AND RECYCLING ACTIVITIES

- 2001 SARA Title III -

Quantity Released Reporting Values (1)

- Section 313 Reporting -

Projections for 2002 and 2003 are based on the assumption that the production rate will remain relatively stable over the next two years and no major changes to equipment or operating procedures will be made.

		Quantity R	Quantity Released		
Section 313 Chemical	2000	2001	2002	2003	
Ammonia				· · · · · · · · · · · · · · · · · · ·	
Arsenic Compounds					
Cadmium Compounds					
Chlorine					
Chromium Compounds	18	11	11	11	
Copper Compounds					
Cumene					
Cyanide Compounds					
Glycol Ethers	43,163	37,961	37,961	37,961	
Ethylbenzene		10,166			
Formaldehyde					
Hydrochloric Acid					
Hydrogen Fluoride					
Lead Compounds					
Manganese Compounds					
Methyl Ethyl Ketone					
Methyl IsoButyl Ketone					
Molybdenum Trioxide					
n-Butyl Alcohol	7,319	18,853	18,853	18,853	
Naphthalene	6,905	8,101	8,101	8,101	
Nickel Compounds					
Nitric Acid					
sec-Butyl Alcohol					
Sulfuric Acid					
Toluene					
Xylene	10,359	16,236	16,236	16,236	
Zinc Compounds	6,263	1,968	1,968	1,968	
1,2,4-Trimethylbenzene	31,835	30,292	30,292	30,292	
Totals	105,862	123,587	113,421	113,42	

NOTES

(1) Reported in Section 8.1, Columns A through D, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -
- Section 313 Reporting -

There were no energy recovery sources for the Beech Bottom Plant subject to SARA 313 regulations in 2001. Therefore, there is no data in this section.

Energy Recovery
Sources and Estimates

		0 (1 - (2) - 6	P	Domestald	Danastalila	
		Quantity (a) of	Exceeds	Reportable	Reportable	
		313 Chemical	Threshold	Based On	For	Reportable
Section 313	Concentration (1)		for Facility	De-Minimis	Facility	Quantity
Chemical	(Weight %)	(lbs)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia			N	N	N	
Arsenic Compounds			N	N	N	
Cadmium Compounds			N	N	N	
Chlorine			N	N	N	
Chromium Compounds			Y	N	Y	
Copper Compounds			N	N	N	
Cumene			N	N	N	
Cyanide Compounds			N	N	N	
Glycol Ethers			Y	N	Y	
Ethylbenzene			Y	N	Y	
Formaldehyde			N	N	N	
Hydrochloric Acid			N	N	N	
Hydrogen Fluoride			N	N	N	
Lead Compounds			N	Y	N	
Manganese Compounds			N	N	N	
Methyl Ethyl Ketone			N	N	N	
Methyl IsoButyl Ketone			N	N	N	
Molybdenum Trioxide			N	N	N	
n-Butyl Alcohol			Y	N	Y	
Naphthalene			Y	N	Y	
Nickel Compounds			N	N	N	
Nitric Acid			N	N	N	
sec-Butyl Alcohol			N	N	N	
Sulfuric Acid			N	N	N	
Toluene			N	N	N	
Xylene			Y	N	Y	
Zinc Compounds			Y	N	Y	
1,2,4-Trimethylbenzene			Y	N	Y	
Totals		0				(

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

SOURCE REDUCTION AND RECYCLING ACTIVITIES

Quantity Used for Energy Recovery On-Site Reporting Values (1)

No Reportable On-Site Energy Recovery Quantities

	Quantit	y Used for Ene	ergy Recovery	On-Site
Section 313 Chemical	2000	2001	2002	2003
Ammonia				
Arsenic Compounds				
Cadmium Compounds				
Chlorine				
Chromium Compounds				
Copper Compounds				
Cumene				
Cyanide Compounds				
Glycol Ethers	1			
Ethylbenzene				
Formaldehyde				
Hydrochloric Acid				
Hydrogen Fluoride				
Lead Compounds				
Manganese Compounds				
Methyl Ethyl Ketone				
Methyl IsoButyl Ketone				
Molybdenum Trioxide				
n-Butyl Alcohol				
Naphthalene				
Nickel Compounds				
Nitric Acid				
sec-Butyl Alcohol				
Sulfuric Acid				
Toluene				
Xylene				
Zinc Compounds				
1,2,4-Trimethylbenzene				
Totals				

(1) Reported in Section 8.2, Columns A through D, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -

- Section 313 Reporting -

SOURCE REDUCTION AND RECYCLING ACTIVITIES

Quantity Used for Energy Recovery Off-Site Reporting Values (1)

No Reportable Off-Site Energy Recovery Quantities

-	Quantit	y Used for Ene	ergy Recovery	Off-Site
Section 313 Chemical	2000	2001	2002	2003
Ammonia				
Arsenic Compounds		T		
Cadmium Compounds				
Chlorine				
Chromium Compounds				
Copper Compounds				
Cumene				
Cyanide Compounds				
Glycol Ethers				
Ethylbenzene				
Formaldehyde				
Hydrochloric Acid				
Hydrogen Fluoride	,			
Lead Compounds				
Manganese Compounds				
Methyl Ethyl Ketone				
Methyl IsoButyl Ketone				
Molybdenum Trioxide				
n-Butyl Alcohol				
Naphthalene				
Nickel Compounds				
Nitric Acid				
sec-Butyl Alcohol				
Sulfuric Acid				
Toluene				
Xylene				
Zinc Compounds				
1,2,4-Trimethylbenzene				
Totals				

(1) Reported in Section 8.3, Columns A through D, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -
- Section 313 Reporting -

There were no recycle sources for the Beech Bottom Plant subject to SARA 313 regulations in 2001. Therefore, there is no data in this section.

Recycle Sources and Estimates

		Quantity (a) of	Exceeds	Reportable	Reportable	
		313 Chemical	Threshold	Based On	For	Reportable
Section 313	Concentration (1)		for Facility	De-Minimis	Facility	Quantity
Chemical	(Weight %)	(lbs)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia			N	N	N	
Arsenic Compounds			N	N	N	
Cadmium Compounds			N	N	N	
Chlorine			N	N	N	
Chromium Compounds			Y	N	Y	
Copper Compounds			N	N	N	
Cumene			N	N	N	
Cyanide Compounds			N	N	N	
Glycol Ethers			Y	N	Y	
Ethylbenzene			Y	N	Y	
Formaldehyde			N	N	N	
Hydrochloric Acid			N	N	N	
Hydrogen Fluoride			N	N	N	
Lead Compounds			N	Y	N	
Manganese Compounds			N	N	N	
Methyl Ethyl Ketone			N	N	N	
Methyl IsoButyl Ketone			N	N	N	
Molybdenum Trioxide			N	N	N	
n-Butyl Alcohol			Y	N	Y	
Naphthalene			Y	N	Y	
Nickel Compounds			N	N	N	
Nitric Acid			N	N	N	
sec-Butyl Alcohol			N	N	N	
Sulfuric Acid			N	N	N	
Toluene			N	N	N	
Xylene			Y	N	Y	
Zinc Compounds			Y	N	Y	
1,2,4-Trimethylbenzene			Y	N	Y	
Totals		0				

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

SOURCE REDUCTION AND RECYCLING ACTIVITIES

- 2001 SARA Title III -

Quantity Recycled On-Site Reporting Values (1)

- Section 313 Reporting -

No Reportable On-Site Recycling Quantities

		Quantity Rec	ecycled On-Site		
Section 313 Chemical	2000	2001	2002	2003	
Ammonia					
Arsenic Compounds					
Cadmium Compounds					
Chlorine					
Chromium Compounds					
Copper Compounds					
Cumene					
Cyanide Compounds					
Glycol Ethers					
Ethylbenzene					
Formaldehyde					
Hydrochloric Acid					
Hydrogen Fluoride					
Lead Compounds					
Manganese Compounds					
Methyl Ethyl Ketone					
Methyl IsoButyl Ketone					
Molybdenum Trioxide					
n-Butyl Alcohol					
Naphthalene					
Nickel Compounds					
Nitric Acid					
sec-Butyl Alcohol					
Sulfuric Acid					
Toluene					
Xylene					
Zinc Compounds					
1,2,4-Trimethylbenzene					
Totals					

(1) Reported in Section 8.4, Columns A through D, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

SOURCE REDUCTION AND RECYCLING ACTIVITIES

- 2001 SARA Title III -

Quantity Recycled Off-Site Reporting Values (1)

- Section 313 Reporting -

No Reportable Off-Site Recycling Quantities

		Quantity Rec	ycled Off-Site	
Section 313 Chemical	2000	2001	2002	2003
Ammonia				
Arsenic Compounds				
Cadmium Compounds				
Chlorine				
Chromium Compounds				
Copper Compounds				
Cumene				
Cyanide Compounds				
Glycol Ethers				
Ethylbenzene				
Formaldehyde				
Hydrochloric Acid				
Hydrogen Fluoride				
Lead Compounds				
Manganese Compounds				
Methyl Ethyl Ketone				
Methyl IsoButyl Ketone				
Molybdenum Trioxide				
n-Butyl Alcohol			·	
Naphthalene				
Nickel Compounds				
Nitric Acid				
sec-Butyl Alcohol				
Sulfuric Acid				
Toluene				
Xylene				
Zinc Compounds				
1,2,4-Trimethylbenzene				
Totals				

(1) Reported in Section 8.5, Columns A through D, of Form Rs.

F	1										
WHEELING CORRUGATING CO.	Process Waste	ewaters									
BEECH BOTTOM PLANT	Disposition: On-Site Treatment By Precipitation										
- 2001 SARA Title III -	,,										
- Section 313 Reporting -			Proc	cess:	Coil Coating						
					2001	2000					
	┪		Quantity	Generated (1):	0.0270	0.0270	MGD				
Wastewater Treatment	1		, ,	Threshold:	25,000		lbs				
Sources and Estimates	}		Treatment	Efficiency (2):	0		%				
Sources and Estimates			***************************************		·						
			Ouanti	ty ^(b) of	Quanti	ty (3) of		Exceeds	Reportable	Reportable	2001
ł	Concent	ration (s)	313 Chemi	·		al Removed	Removal (c,5)	Threshold	Based On	For	Reportable
										Facility	,
Section 313	(Weig		2001	os) 2000	2001	2000	Efficiency	for Facility	De-Minimis	1 1	Quantity
Chemical	2001	2000	2001	2000	2001	2000	(%)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia								N	N	N	
Arsenic Compounds	2.87E-07	1.59E-06			0		100.0	N	N.	N	
Cadmium Compounds	 							N	N	N	
Chlorine	ļ							N	N	N	
Chromium Compounds	1.15E-06	6.35E-06			1	5		Y	N	Y	
Copper Compounds	3.70E-06	2.04E-05			3	17	100.0	N	N	N	
Cumene								N	N	N	
Cyanide Compounds	1.54E-07	8.51E-07			0	<u> </u>	99.4	N	N	N	
Glycol Ethers								Y	N	Y	· ·
Ethylbenzene								Y	N	Y	
Formaldehyde							<u> </u>	N	N	N	
Hydrochloric Acid								N	N	N	
Hydrogen Fluoride								N	N	N	
Lead Compounds	3.08E-06	1.70E-05			3			N	Y	N	
Manganese Compounds	2.13E-04	1.17E-03			175	966	100.0	N	N	N	
Methyl Ethyl Ketone								N	N	N	
Methyl IsoButyl Ketone								N	N	N	
Molybdenum Trioxide								N	N	N	
n-Butyl Alcohol								Y	N	Y	
Naphthalene					L			Y	N	Y	
Nickel Compounds (4)	1.26E-05	6.98E-05			10	57	100.0	N	N	N	
Nitric Acid								N	N	N	
sec-Butyl Alcohol						L		N	N	N	
Sulfuric Acid								N	N	N	
Toluene					<u> </u>			N	N	N	L
Xylene								Y	N	Y	
Zinc Compounds	3.70E-04	2.04E-03			304	1,680	100.0	Y	N	Y	
1,2,4-Trimethylbenzene								Y	N	Y	
Total	100		STATES	Control of the Control	496	2,742	45.75	100	10 A 4 5 4	F 25 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	
MOTES											

NOTES

- (1) Based On 2000 and 2001 Wheeling-Pittsburgh Steel Corporation Data.
- (2) Treatment Efficiency Is 0 Because There Is No Destruction Of Chemicals During Treatment.
- (3) Equivalent To Sludge Release Quantity.
- (4) Removal Efficiency For Nickel Is Based On Best Engineering Judgment.
- (5) A Removal Efficiency Of 100% Indicates That No Data Is Available Regarding Water Release Quantity.

FORMULAS

- (a) (Sludge Release Quantity + Water Release Quantity)/(Quantity Of Wastewater Generated x 8.345 x 10^4 x 365).
- (b) Quantity Of Wastewater Generated x Concentration x 8.345 x 10⁴ x 365 x (Treatment Efficiency/100).
- (c) [(Sludge Release Quantity)/(Sludge Release Quantity + Water Release Quantity)] x 100.

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WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Total Wastewater Treatment Sources and Estimates

	1	On-Site On-Site					
	Process Wastewater		Process \	Vastewater	Wastewater Treatment		
Section 313	By Neu	tralization	By Pre	cipitation	Qua	ntities	
Chemical		lbs		bs		bs	
	Treated	Reportable	Treated	Reportable	Treated	Reportable	
Ammonia							
Arsenic Compounds			-				
Cadmium Compounds		T					
Chlorine							
Chromium Compounds							
Copper Compounds							
Cumene							
Cyanide Compounds							
Glycol Ethers							
Ethylbenzene							
Formaldehyde							
Hydrochloric Acid							
Hydrogen Fluoride							
Lead Compounds							
Manganese Compounds							
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone							
Molybdenum Trioxide							
n-Butyl Alcohol							
Naphthalene							
Nickel Compounds							
Nitric Acid							
sec-Butyl Alcohol							
Sulfuric Acid	#REF!				#REF!		
Toluene							
Xylene							
Zinc Compounds							
1,2,4-Trimethylbenzene							
-,-,,	#REF!				#REF!		

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2001 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Total Air Treatment Sources and Estimates

		Air Treatme	ent Sources		Total On-Site Air		
Section 313	Prime	r Line	Finishir	ng Line	Treatment	Quantities	
Chemical	Ib	s	lb	s	lbs		
	Treated	Reportable	Treated	Reportable	Treated	Reportable	
Ammonia							
Arsenic Compounds							
Cadmium Compounds							
Chlorine							
Chromium Compounds							
Copper Compounds							
Cumene	655		4,059		4,714		
Cyanide Compounds							
Glycol Ethers	23,323	23,323	144,552	144,552	167,875	167,875	
Ethylbenzene	6,246	6,246	38,713	38,713	44,960	44,960	
Formaldehyde	136		841		976		
Hydrochloric Acid							
Hydrogen Fluoride							
Lead Compounds							
Manganese Compounds							
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone							
Molybdenum Trioxide							
n-Butyl Alcohol	11,583	11,583	71,790	71,790	83,374	83,374	
Naphthalene	4,977	4,977	30,849	30,849	35,827	35,827	
Nickel Compounds							
Nitric Acid							
sec-Butyl Alcohol	990		6,137		7,128		
Sulfuric Acid							
Toluene	2		15		18		
Xylene	9,976	9,976	61,827	61,827	71,803	71,803	
Zinc Compounds							
1,2,4-Trimethylbenzene	18,611	18,611	115,349	115,349	133,960	133,960	
Totals	76,499	74,716	474,134	463,081	550,633	537,797	

NOTES

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

SOURCE REDUCTION AND RECYCLING ACTIVITIES

- 2001 SARA Title III -

- Section 313 Reporting -

Quantity Treated On-Site Reporting Values (1)

Projections for 2001 and 2002 are based on the assumption that the production rate will remain relatively stable over the next two years and no major changes to equipment or operating procedures will be made.

		Quantity Treated On-Site						
Section 313 Chemical	2000	2001	2002	2003				
Ammonia								
Arsenic Compounds								
Cadmium Compounds								
Chlorine								
Chromium Compounds								
Copper Compounds								
Cumene								
Cyanide Compounds								
Glycol Ethers	190,881	167,875	167,875	167,875				
Ethylbenzene		44,960	44,960	44,960				
Formaldehyde								
Hydrochloric Acid								
Hydrogen Fluoride								
Lead Compounds								
Manganese Compounds								
Methyl Ethyl Ketone								
Methyl IsoButyl Ketone								
Molybdenum Trioxide								
n-Butyl Alcohol	32,365	83,374	83,374	83,374				
Naphthalene	30,535	35,827	35,827	35,827				
Nickel Compounds								
Nitric Acid								
sec-Butyl Alcohol								
Sulfuric Acid								
Toluene								
Xylene	45,813	71,803	71,803	71,803				
Zinc Compounds								
1,2,4-Trimethylbenzene	140,785	133,960	133,960	133,960				
Totals	440,379	537,797	537,797	537,797				

(1) Reported in Section 8.6, Columns A through D, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

SOURCE REDUCTION AND RECYCLING ACTIVITIES

- 2001 SARA Title III -

Quantity Treated Off-Site Reporting Values (1)

- Section 313 Reporting -

No Reportable Off-Site Treatment Quantities

	Quantity Treated Off-Site						
Section 313 Chemical	2000	2001	2002	2003			
Ammonia							
Arsenic Compounds							
Cadmium Compounds							
Chlorine							
Chromium Compounds							
Copper Compounds							
Cumene							
Cyanide Compounds							
Glycol Ethers							
Ethylbenzene							
Formaldehyde							
Hydrochloric Acid							
Hydrogen Fluoride							
Lead Compounds							
Manganese Compounds							
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone							
Molybdenum Trioxide							
n-Butyl Alcohol							
Naphthalene							
Nickel Compounds							
Nitric Acid							
sec-Butyl Alcohol							
Sulfuric Acid							
Toluene							
Xylene							
Zinc Compounds							
1,2,4-Trimethylbenzene							
Totals							

NOTES

(1) Reported in Section 8.7, Columns A through D, of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -
- Section 313 Reporting -

There were no non-production related releases or off-site transfers for the Beech Bottom Plant subject to SARA 313 regulations in 2001. Therefore, there is no data in this section.

Non-Production Related Releases and Off-Site Transfers Sources and Estimates

		Quantity (a) of	Exceeds	Reportable	Reportable	
	`	313 Chemical	Threshold	Based On	For	Reportable
Section 313	Concentration (1)		for Facility	De-Minimis	Facility	Quantity (1
Chemical	(Weight %)	(lbs)	(Y or N)	(Y or N)	(Y or N)	(lbs)
Ammonia	(Weight 70)	(103)	N	N	N	(103)
Arsenic Compounds			N	N	N	
Cadmium Compounds	 		N	N	N	
Chlorine			N	N	N	
Chromium Compounds	 		Y	N	Y	
Copper Compounds			N	N	N	
Cumene			N	N	N	
Cyanide Compounds			N	N	N	
Glycol Ethers			Y	N	Y	
Ethylbenzene			Y	N	Y	
Formaldehyde			N	N	N	
Hydrochloric Acid			N	N	N	
Hydrogen Fluoride			N	N	N	
Lead Compounds			N	Y	N	
Manganese Compounds			N	N	N	
Methyl Ethyl Ketone			N	N	N	
Methyl IsoButyl Ketone			N	N	N	
Molybdenum Trioxide			N	N	N	
n-Butyl Alcohol			Y	N	Y	
Naphthalene			Y	N	Y	
Nickel Compounds	 		N	N	N	
Nitric Acid			N	N	N	
sec-Butyl Alcohol	+		N	N	N	
Sulfuric Acid	 		N	N	N	
Toluene			N	N	N	
Xylene			Y	N N	Y	
Zinc Compounds			Y	N	Y	
1,2,4-Trimethylbenzene			Y	N	Y	
Totals		0				

NOTES

(1) Reported in Section 8.7 of Form Rs.

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2001 SARA Title III -
- Section 313 Reporting -

Activity Indices/ Production Ratios

Section 313 Chemical	Activity Index/ Production Ratio (1)
Ammonia	
Arsenic Compounds	
Cadmium Compounds	
Chlorine	
Chromium Compounds (2)	0.94
Copper Compounds	
Cumene	
Cyanide Compounds	
Glycol Ethers (2)	0.94
Ethylbenzene	
Formaldehyde	
Hydrochloric Acid	
Hydrogen Fluoride	
Lead Compounds	
Manganese Compounds	
Methyl Ethyl Ketone	
Methyl IsoButyl Ketone	
Molybdenum Trioxide	
n-Butyl Alcohol (2)	0.94
Naphthalene (2)	0.94
Nickel Compounds	
Nitric Acid	
sec-Butyl Alcohol	
Sulfuric Acid	
Toluene	
Xylene (2)	0.94
Zinc Compounds (2)	0.94
1,2,4-Trimethylbenzene (2)	0.94
NOTES	

NOTES

- (1)Reported in Section 8.8 of Form Rs.
- (2)Quantity of Steel Processed on Coil Coating Line in 2001 / Quantity of Steel Processed on Coil Coating Line in 2000.

Wheeling Corrugating Company Beech Bottom Plant SARA Section 313 Questionnaire - 2001 Reporting Year

	Reporting Year			2001 Contact		
Item of Interest	1999	2000	2001	Units	Name	Phone No.
1) Quantity of Coating Line Steel Processed	147,718	162,199	151,932	Tons	LouAnn McGee	(304)234-4274
2) Quantity of Sulfuric Acid Used (93.2% by wt.)	15,682	15,682		Gallons	LouAnn McGee	(304)234-4274
3) Quantity of Chlorine Used	2,800	2,800	1,715	Pounds	LouAnn McGee	(304)234-4274
4) Quantity of Nitric Acid Used	43	0	0	Gallons	LouAnn McGee	(304)234-4274
5) Quantity of Bulk 309R Used (formerly 346WX)	410,000	420,000	281,411	Pounds	LouAnn McGee	(304)234-4274
6) Quantity of Bulk Bond NP400B	116,000	120,000	187,395	Pounds	LouAnn McGee	(304)234-4274
7) Quantity of Bulk Phosbond #1 Used	15,250	16,000		Pounds	LouAnn McGee	(304)234-4274
8) Quantity of Bulk Kleen 968L (formerly 7200W) Used	250,000	270,000	28,595	Pounds	LouAnn McGee	(304)234-4274
9) Quantity of Coating Line Paint Used						
Valspar PMA0327 - Backer	443,212	44,211	46,541	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar PMA0895 - Roof Deck	790,969	57,876	7,218	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar PMW0674 - Liner Panel White	13,085	0	3,081	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar PMW1704	3,241	2,260	433	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar PMY0302	0	0	2,450	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar PTY0016 - Primer	673,606	56,106	53,817	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPA0056 - Pewter Gray	72,787	6,114	7,933	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPA0057 - Black	16,616	0	1,798	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPA0085 - Quaker Gray	52,206	3,027	5,202	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPB0084 - Brown	64,616	9,771	8,495	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPB0109 - Ant. Brown	17,149	2,906	2,104	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPD0073 - Rawhide/Tan	49,644	3,064			LouAnn McGee/ Valspar	(304)234-4274
Valspar SPD0074 - Beige	68,421	12,797	8,585	Gallons	LouAnn McGee/ Valspar	(304)234-4274
Valspar SPD0126 - Sandstone	40,320	5,495			LouAnn McGee/ Valspar	(304)234-4274
Valspar SPD0157 - Clay	31,813	0	2,378		LouAnn McGee/ Valspar	(304)234-4274
Valspar SPG0074 - Evergreen	173,862	19,209	19,644		LouAnn McGee/ Valspar	(304)234-4274
Valspar SPL0083 - Slate Blue	30,130	3,296			LouAnn McGee/ Valspar	(304)234-4274
Valspar SPR0062 - Barn Red		22,388	<u> </u>		LouAnn McGee/ Valspar	(304)234-4274
Valspar SPR0133 - Burgundy	12,171	0	922		LouAnn McGee/ Valspar	(304)234-4274
Valspar SPW0040 - White	492,650	54,798			LouAnn McGee/ Valspar	(304)234-4274
Valspar SPW0203	0	0			LouAnn McGee/ Valspar	(304)234-4274
Yenkin-Majestic E-1388	165,721				LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic E-2325	556,061	0	0		LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic E-2420		603,539			LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic E-2421					LouAnn McGee/ Yenkin-Majest	` /
Yenkin-Majestic E-2489		34,577			LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic E-2583		1,065	0	_	LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic E-7949	66,637	197,401	0		LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic P-9810					LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic SW5X32253		1,287	0		LouAnn McGee/ Yenkin-Majest	
Yenkin-Majestic UY9R24235A		1,144	0		LouAnn McGee/ Yenkin-Majest	
10) Quantity of Wastewater Treatment Sludge Generated	466	1,077	195		LouAnn McGee	(304)234-4274
11) Quantity of Zinc Phosphate Sludge Generated	73	80	26		LouAnn McGee	(304)234-4274
12) Quantity of Waste Paint Rags Generated		11,400	9,539		LouAnn McGee	(304)234-4274
13) Quantity of Waste Chromium Generated		1,400	500		LouAnn McGee	(304)234-4274
Notes:		1		1		

Nitric Acid Used (gallons/yr) = [0 lbs/yr (from SARA 312) / [1.41 s.g. * 8.34 lb/gal]

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY WHEELING CORRUGATING COMPANY - BEECH BOTTOM PLANT

Contents of Spreadsheet (continued)

THE CONTRACT OF GRAFINE

Corresponds to Form R Sections:

8.1 Quantity Released (Sum of Worksheets C, D, & E)

Corresponds to Form R Sections:

- 6.2 Transfers to Other Off-Site Locations (Production-Related Energy Recovery Sources Only: Codes M56 & M92)
 - 8.2 Quantity Used for Energy Recovery On-Site
 - 8.3 Quantity Used for Energy Recovery Off-Site

Corresponds to Form R Section:

- 6.2 Transfers to Other Off-Site Locations (Production-Related Recycle Sources Only: Codes M20, M24, M26, M28, & M93)
 - 8.4 Quantity Recycled On-Site
 - 8.5 Quantity Recycled Off-Site

Corresponds to Form R Sections:

- 6.1 Discharges to Publicly Owned Treatment Works
- 6.2 Transfers to Other Off-Site Locations (Production-Related Treatment Sources Only: Codes
- 8.6 Quantity Treated On-Site

M40, M50, M54, M61, M69, & M95)

8.7 Quantity Treated Off-Site

Corresponds to Form R Sections:

- 6.2 Transfers to Other Off-Site Locations (Non-Production Related Releases to Land and Energy Recovery, Recycle, and Treatment Sources Only)
- 8.8 Quantity Released to the Environment as a Result of Remedial Actions, Catastrophic Events, or One-Time Events Not Associated with Production Processes

Corresponds to Form R Sections:

8.9 Production Ratio or Activity Index

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2002 SARA Title III -

- Section 313 Reporting -

Facility Section 313 Chemicals and De-Minimis Concentrations

·			
		Coil Coating	Coil Coating
	De-Minimis	Volatile	Reportable
Section 313	Concentration	Compound	Chemical
Chemical (1)	(Weight %)	(N or Y)	(N or Y)
Ammonia	1.0	N	N
Antimony Compounds	1.0	N	N
Arsenic Compounds	0.1	N	N
Cadmium Compounds	0.1	N	N
Chlorine	1.0	N	N
Chromium Compounds	0.1	N	* - Y * * *
Cobalt Compounds	0.1	N	N
Copper Compounds	1.0	N	N
Cumene	1.0	Y	N
Cyanide Compounds	1.0	N	N
Dimethyl Phthalate	1.0	Y	N
Glycol Ethers	1.0	Y	Y
Ethyl Acrylate	0.1	Y	N
Ethylbenzene	0.1	Y	Y
Formaldehyde	0.1	Y	N
Hydrochloric Acid	1.0	N	N
Hydrogen Fluoride	1.0	N	N
Lead Compounds	0.0	N	N
Manganese Compounds	1.0	N	N
Methyl Ethyl Ketone	1.0	Y	N
Methyl IsoButyl Ketone	1.0	Y	N
Molybdenum Trioxide	1.0	N	N
n-Butyl Alcohol	1.0	Y	- 124 Yes
Naphthalene	1.0	Y	A LY HAR
Nickel Compounds	0.1	N	N
Nitric Acid	1.0	N	146 Y 48 B
sec-Butyl Alcohol	1.0	Y	N
Sulfuric Acid	1.0	N	N
Toluene	1.0	Y	N
Xylene	1.0	Y	Y
Zinc Compounds	1.0	N	YAZZ
1,2,4-Trimethylbenzene	1.0	Y	Story Yellow

NOTES

(1)Sulfuric Acid is only reportable as a fume.

WHEELING CORRUGATING COMPANY BEECH BOTTOM PLANT

- 2002 SARA Title III -
- Section 313 Reporting -

Facility Section 313 Chemicals and Quantities Manufactured, Processed and Otherwise Used

	Amount	Manufactured	Amount	Processed	Amount	Otherwise Used	Facility
	Manufactured	Reportable	Processed	Reportable	Otherwise	Reportable	Reportable
Section 313		Chemical		Chemical	Used	Chemical	Chemical
Chemical	(lbs)	(N or Y)	(lbs)	(N or Y)	(lbs)	(N or Y)	(Y or N)
Ammonia	0	N	0	N	0	N	N
Antimony Compounds	0	N	2,804	N	0	N	N
Arsenic Compounds	0	N	0	N	0	N	N
Cadmium Compounds	0	N	0	N	0	N	N
Chlorine	0	N	0	N	1,798	N	N
Chromium Compounds	0	N	111,382	Y	5,208	N	Y
Cobalt Compounds	0	N	60	N	0	N	N
Copper Compounds	0	N	38	N	0	N	N
Cumene	0	N	6,307	N	0	N	N
Cyanide Compounds	0	N	0	N	0	N	N
Dimethyl Phthalate	0	N	38	N	0	N	N
Glycol Ethers	0	N	172,109	Y	0	N	Y
Ethyl Acrylate	0	N	0	N	0	N	N
Ethylbenzene	0	N	43,841	Y	0	N	Y
Formaldehyde	0	N	1,268	N	0	N	N
Hydrochloric Acid	0	N	0	N	0	N	N
Hydrogen Fluoride	0	N	0	N	0	N	N
Lead Compounds	0	N	1,140	N	0	N	N
Manganese Compounds	0	N	571	N	0	N	N
Methyl Ethyl Ketone	0	N	3,683	N	0	N	N
Methyl IsoButyl Ketone	0	N	0	N	0	N	N
Molybdenum Trioxide	0	N	0	N	0	N	N
n-Butyl Alcohol	0	N	131,830	Y	0	N	Y
Naphthalene	0	N	59,086	Y	0	N	Y
Nickel Compounds	0	N	1,856	N	8,374	N	N_
Nitric Acid	0	N	0	N	27,635	Y	Y
sec-Butyl Alcohol	0	N	5,140	N	0	N	N
Sulfuric Acid	0	N	0	N	0	N	N
Toluene	0	N	215	N	0	N	N
Xylene	0	N	83,410	Y	0	N	Y
Zinc Compounds	0	N	33,619	Y	10,468	Y	Y
1,2,4-Trimethylbenzene	0	N	163,149	Y	0	N	Y
Totals			821,545		53,484		

** Sulfuric Acid "N" manually inserted due to only fume reportablity

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2002 SARA Title III -

- Section 313 Reporting -

Coating Line Steel

INFORMATIONAL PURPOSES ONLY - ARTICLE EXEMPTION APPLIES

2002

2001

Total Processed(tons):

182,496

151,932

Section 313 Chemicals Contained in Steel Coated Threshold:

25,000 lbs

			Quantity	y ^(a) of	Exceeds	Reportable
	Concentra	ition ⁽¹⁾	313 Che	mical	Threshold	Based on
Section 313	(Weigh	(Weight %)		i)	for Facility	De-Minimis
Chemical	2002	2001	2002	2001	(Y or N)	(Y or N)
Ammonia					N	N
Antimony Compounds	1	}	İ		N	N
Arsenic Compounds	0.001	0.001	3,650	3,039	N	N
Cadmium Compounds					N	N
Chlorine					N	N
Chromium Compounds	0.020	0.014	72,998	42,541	Y	N
Cobalt Compounds					N	N
Copper Compounds	0.029	0.019	105,848	57,734	N	N
Cumene					N	N
Cyanide Compounds					N	N
Dimethyl Phthalate					N	N
Glycol Ethers					Y	N
Ethyl Acrylate					N	N
Ethylbenzene					Y	N
Formaldehyde					N	N
Hydrochloric Acid					N	N
Hydrogen Fluoride					N	N
Lead Compounds					N	Y
Manganese Compounds	0.380	0.410	1,386,970	1,245,842	N	N
Methyl Ethyl Ketone					N	N
Methyl IsoButyl Ketone					N	N
Molybdenum ⁽²⁾	0.006	0.006	21,900	18,232	N	N
n-Butyl Alcohol					Y	N
Naphthalene					Y	N
Nickel Compounds	0.005	0.005	18,250	15,193	N	N
Nitric Acid					Y	N
sec-Butyl Alcohol					N	N
Sulfuric Acid					N	N
Toluene					N	N
Xylene					Y	N
Zinc Compounds					Y	N
1,2,4-Trimethylbenzene					Y	N
Totals			1,609,615	1,382,581		

NOTES

FORMULAS

(a)Total Processed x (Concentration/100) x 2,000.

⁽¹⁾Concentrations From 2001 and 2000 Wheeling-Pittsburgh Steel Corporation Analysis.

⁽²⁾Reportable As Molybdenum Trioxide; Multiply By 1.5 To Obtain Molybdenum Trioxide Concentration And Quantity.

WHEELING CORRUGATING CO. Sulfuric Acid (liquid) (2) BEECH BOTTOM PLANT - 2002 SARA Title III -- Section 313 Reporting -Total Used (2002): NA gal Total Used (2001): NA gal 14.2 lbs/gal Section 313 Chemicals Density: Threshold: 10,000 lbs Contained in Water and Wastewater Treatment Supplies -Sulfuric Acid Quantity(a) of Exceeds Reportable 313 Chemical Threshold Based on Concentration⁽¹⁾ Section 313 for Facility De-Minimis (lbs) 2002 2001 (Y or N) Chemical (Weight %) (Y or N) N Ammonia N **Antimony Compounds** N N N Arsenic Compounds N Cadmium Compounds N N N N Chlorine Chromium Compounds Y N Cobalt Compounds N N Copper Compounds N N N N Cumene Cyanide Compounds N N Dimethyl Phthalate N N Y N Glycol Ethers N N Ethyl Acrylate N Ethylbenzene Y Formaldehyde N $\overline{\mathsf{N}}$ Hydrochloric Acid N N Hydrogen Fluoride N Ν Lead Compounds N Ÿ Manganese Compounds N N N Methyl Ethyl Ketone N N Methyl IsoButyl Ketone N Molybdenum Trioxide N N n-Butyl Alcohol $\overline{\mathbf{Y}}$ N Naphthalene $\overline{\mathbf{Y}}$ N Nickel Compounds N N Nitric Acid Ÿ N sec-Butyl Alcohol N N Sulfuric Acid N N Toluene N N Xylene Ÿ N Zinc Compounds Y N 1,2,4-Trimethylbenzene Y N Totals 0 NOTES (1)Concentrations From Material Safety Data Sheet. (2) Sulfuric acid is only reportable as an aerosol. **FORMULAS** (a)Total Used x Density x (Concentration/100).

WHEELING CORRUC	GATING CO.						
веесн воттом	PLANT	<u>Chlorine</u>					
- 2002 SARA Tit	le III -						
- Section 313 Repo	orting -	Total Used (2002):		1,800			
		Total Use		1,715			
Section 313 Cher	nicals	Thres	hold:	10,000	lbs		
Contained in Water and							
Wastewater Treatment	Supplies -						
Chlorine							
		Quanti	ty ^(a) of	Exceeds	Reportable		
		313 Ch	emical	Threshold	Based on		
Section 313	Concentration ⁽¹⁾	(lt	ns)	for Facility	De-Minimis		
Chemical	(Weight %)	2002	2001	(Y or N)	(Y or N)		
Ammonia	(voigne /o)			N	N		
Antimony Compounds				N	N		
Arsenic Compounds				N	N		
Cadmium Compounds	 			N	N		
Chlorine	99.9	1,798	1,713	N	Y		
Chromium Compounds	33.3	1,736	1,713	Y	N		
Cobalt Compounds				N	N		
Copper Compounds		-		N	N		
Cumene				N	N		
Cyanide Compounds				N	N		
Dimethyl Phthalate				N	N		
Glycol Ethers				Y	N		
Ethyl Acrylate				N	N		
Ethylbenzene				Y	N		
Formaldehyde				N	N		
Hydrochloric Acid				N	N		
Hydrogen Fluoride				N	N		
Lead Compounds				N	Y		
Manganese Compounds				N	N		
Methyl Ethyl Ketone				N	N		
Methyl IsoButyl Ketone				N	N		
Molybdenum Trioxide				N	N		
n-Butyl Alcohol					N		
Naphthalene				Y	N		
Nickel Compounds				N	N		
Nitric Acid				Y	N		
sec-Butyl Alcohol				N	N		
Sulfuric Acid				N	N		
Toluene				N	N		
Xylene				Y	N		
Zinc Compounds				Y	N		
1,2,4-Trimethylbenzene				Y	N		
Totals		1,798	1,713				
NOTES		1,770	1,713				
(1)Concentrations From Mater	rial Safety Data Shee	ıt					
FORMULAS	iai Jaiety Data Silee						
(a)Total Used x (Concentration	/100)						
(a). Olai Osca A (Concentiation							

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Water and Wastewater Treatment Supplies

	Wate	er and Wastewat	Total				
Section 313	Sulfur	Sulfuric Acid Chlorine			Quantity (lbs)		
Chemical	(1)	(lbs) (lbs)					
	2002	2001	2002	2001	2002	2001	
Ammonia							
Antimony Compounds							
Arsenic Compounds							
Cadmium Compounds							
Chlorine			1,798	1,713	1,798	1,713	
Chromium Compounds							
Cobalt Compounds							
Copper Compounds							
Cumene							
Cyanide Compounds							
Dimethyl Phthalate							
Glycol Ethers							
Ethyl Acrylate							
Ethylbenzene							
Formaldehyde							
Hydrochloric Acid							
Hydrogen Fluoride							
Lead Compounds							
Manganese Compounds							
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone		``					
Molybdenum Trioxide							
n-Butyl Alcohol							
Naphthalene							
Nickel Compounds							
Nitric Acid							
sec-Butyl Alcohol							
Sulfuric Acid							
Toluene							
Xylene							
Zinc Compounds							
1,2,4-Trimethylbenzene							
Totals	0	0	1,798	1,713	1,798	1,71	

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Water and Wastewater Treatment Supplies Greater Than De-Minimis Concentration

	Water and Wastewat	er Treatment Supplies	Total
Section 313	Sulfuric		Quantity
Chemical	Acid	Chlorine	> De-Minimis
	(lbs)	(lbs)	(lbs)
Ammonia			
Antimony Compounds			
Arsenic Compounds			
Cadmium Compounds			
Chlorine		1,798	1,798
Chromium Compounds			
Cobalt Compounds			
Copper Compounds			
Cumene			
Cyanide Compounds			
Dimethyl Phthalate			
Glycol Ethers			
Ethyl Acrylate			
Ethylbenzene			
Formaldehyde			
Hydrochloric Acid			
Hydrogen Fluoride			
Lead Compounds			
Manganese Compounds			
Methyl Ethyl Ketone			
Methyl IsoButyl Ketone			
Molybdenum Trioxide			
n-Butyl Alcohol			
Naphthalene			
Nickel Compounds			
Nitric Acid			
sec-Butyl Alcohol			
Sulfuric Acid			
Toluene			
Xylene			
Zinc Compounds			
1,2,4-Trimethylbenzene			
Totals	0	1,798	1,798

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2002 SARA Title III -

- Section 313 Reporting -

Bulk 309R

Total Used (2002):

418,717 lbs

Total Used (2001):

281,411 lbs

Threshold:

10,000 lbs

Section 313 Chemicals
Contained in Chemical Cleaners Bulk 309R

		Quantit	ty ^(a) of	Exceeds	Reportable
		313 Chemical		Threshold	Based on
Section 313	Concentration ⁽¹⁾	(lb	(2)	for Facility	De-Minimis
Chemical	(Weight %)	2002	2001	(Y or N)	(Y or N)
Ammonia				N	N
Antimony Compounds				N	N
Arsenic Compounds	 			N	N
Cadmium Compounds				N	N
Chlorine				N	N
Chromium Compounds				Y	N
Cobalt Compounds				N	N
Copper Compounds				N	N
Cumene				N	N
Cyanide Compounds				N	N
Dimethyl Phthalate				N	N
Glycol Ethers				Y	N
Ethyl Acrylate				N	N
Ethylbenzene				Y	N
Formaldehyde				N	N ·
Hydrochloric Acid				N	N
Hydrogen Fluoride	0.2	837	563	N	N
Lead Compounds				N	Y
Manganese Compounds				N	N
Methyl Ethyl Ketone				N	N
Methyl IsoButyl Ketone				N	N
Molybdenum Trioxide				N	N
n-Butyl Alcohol				Y	N
Naphthalene				Y	N
Nickel Compounds	2	8,374	5,628	N	Y
Nitric Acid	6.60	27,635	18,573	Y	Y
sec-Butyl Alcohol				N	N
Sulfuric Acid				N	N
Toluene				N	N
Xylene				Y	N
Zinc Compounds	2.5	10,468	7,035	Y	Y
1,2,4-Trimethylbenzene				Y	N
		47,315	31,799		_

NOTES

(1) Concentrations From 6/2/99 Bulk Chemicals Material Safety Data Sheet.

FORMULAS

(a)Total Used x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2002 SARA Title III -

. - Section 313 Reporting -

Bulk Bond NP400B

Total Used (2002):

130,200 lbs

Total Used (2001):

187,395 lbs

Threshold:

10,000 lbs

Section 313 Chemicals
Contained in Chemical Cleaners Bulk Bond NP400B

		Quantity(a) of		Exceeds	Reportable
		313 Ch	emical	Threshold	Based on
Section 313	Concentration ⁽¹⁾	(Ib	s)	for Facility	De-Minimis
Chemical	(Weight %)	2002	2001	(Y or N)	(Y or N)
Ammonia				N	N
Antimony Compounds				N	N
Arsenic Compounds				N	N
Cadmium Compounds				N	N
Chlorine				N	N
Chromium Compounds	4	5,208	7,496	Y	Y
Cobalt Compounds				N	N
Copper Compounds				N	N
Cumene				N	N
Cyanide Compounds				N	N
Dimethyl Phthalate				N	N
Glycol Ethers				Y	N
Ethyl Acrylate				N	N
Ethylbenzene				Y	N
Formaldehyde				N	N
Hydrochloric Acid				N	N
Hydrogen Fluoride				N	N
Lead Compounds				N	Y
Manganese Compounds				N	N
Methyl Ethyl Ketone				N	N
Methyl IsoButyl Ketone				N	N
Molybdenum Trioxide				N	N
n-Butyl Alcohol				Y	N
Naphthalene				Y	N
Nickel Compounds				N	N
Nitric Acid				Y	N
sec-Butyl Alcohol				N	N
Sulfuric Acid				N	N
Toluene				N	N
Xylene				Y	N
Zinc Compounds				Y	N
1,2,4-Trimethylbenzene				Y	N
Totals		5,208	7,496		
MOTEC					

NOTES

(1)Concentrations From Material Safety Data Sheet.

FORMULAS

(a)Total Used x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Chemical Cleaners

		Chemical					
	Bu	Bulk		Bulk Bond		Total	
Section 313	309	309R		00B	Quantity		
Chemical	(lb	s)	(lb	(2)	(lb:	-	
) Chemical	2002			2001	2002	2001	
Ammonia							
Antimony Compounds							
Arsenic Compounds							
Cadmium Compounds							
Chlorine							
Chromium Compounds			5,208	7,496	5,208	7,496	
Cobalt Compounds							
Copper Compounds							
Cumene							
Cyanide Compounds	1						
Dimethyl Phthalate							
Glycol Ethers	1						
Ethyl Acrylate	 						
Ethylbenzene	1						
Formaldehyde							
Hydrochloric Acid							
Hydrogen Fluoride	837	563			837	563	
Lead Compounds	1						
Manganese Compounds							
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone							
Molybdenum Trioxide							
n-Butyl Alcohol							
Naphthalene							
Nickel Compounds	8,374	5,628			8,374	5,628	
Nitric Acid	27,635	18,573			27,635	18,573	
sec-Butyl Alcohol							
Sulfuric Acid	1						
Toluene	 						
Xylene	1						
Zinc Compounds	10,468	7,035			10,468	7,035	
1,2,4-Trimethylbenzene	1						
Totals	47,315	31,799	5,208	7,496	52,523	39,295	

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Chemical Cleaners in Greater Than De-Minimis Concentration

	Chemical		
		Bulk	Total
Section 313	Bulk	Bond	Quantity
*			
Chemical	346WX	NP400B	> De-Minimis
	(lbs)	(lbs)	(lbs)
Ammonia	1		
Antimony Compounds			
Arsenic Compounds			
Cadmium Compounds			
Chlorine			
Chromium Compounds		5,208	5,208
Cobalt Compounds			
Copper Compounds			
Cumene			
Cyanide Compounds			
Dimethyl Phthalate			
Glycol Ethers			
Ethyl Acrylate			
Ethylbenzene			
Formaldehyde			
Hydrochloric Acid			
Hydrogen Fluoride			
Lead Compounds			
Manganese Compounds			
Methyl Ethyl Ketone			
Methyl IsoButyl Ketone			
Molybdenum Trioxide			
n-Butyl Alcohol			
Naphthalene			
Nickel Compounds	8,374		8,374
Nitric Acid	27,635		27,635
sec-Butyl Alcohol			
Sulfuric Acid			
Toluene			
Xylene			
Zinc Compounds	10,468		10,468
1,2,4-Trimethylbenzene			
Totals	46,478	5,208	51,686

WHEELING CORE		О.	Venkin-Majestic F-1388 White					
			Yenkin-Majestic E-1388 White					
- 2002 SARA			D	land (anla).	2002	2001 51,532		
- Section 313	Reporting -	l	Processed/U		52,643 11.539	31,332		
				Density (lb/gal):				
C-+i 212	Section 313 Chemicals				Threshold (lbs)			
Contained in Coil Coating Line Supplies				Volatiles: Nonvolatiles:	10,000 25,000			
Contained in Con Con	ating Line Supp	lies		Nonvolatiles:	25,000			
	· · · · · · · · · · · · · · · · · · ·		Quantit	14(2) of	Exceeds	Reportable		
	Concentra	tion(1)	313 Ch		Threshold	Based on		
Section 313	(Weigh	٠,	(lb		for Facility	De-Minimis		
Chemical	2002	2001	2002	2001	(Y or N)	(Y or N)		
Ammonia	2002	2001	2002	2001	N	N		
Antimony Compounds					N	N		
Arsenic Compounds	┼──┼				N N	N		
Cadmium Compounds	 				N N	N		
Chlorine Compounds	 				N N	N		
Chromium Compounds	 				Y	N		
Cobalt Compounds	 				N N	N		
Copper Compounds	 				N	N		
Cumene	+				N	N		
Cyanide Compounds	 				N	N		
Dimethyl Phthalate	++				N	N		
	5.40	5.40	22 802		- N Y	Y		
Glycol Ethers	3.40	5.40	32,802	32,110	N Y	N		
Ethyl Acrylate Ethylbenzene	0.50	0.50	3,037	2,973	Y	Y		
Formaldehyde	0.30	0.30	3,037	2,973	N	N		
Hydrochloric Acid	 				N N	N		
Hydrogen Fluoride					N	N		
Lead Compounds	++				N N	Y		
Manganese Compounds	 				N N	N		
Methyl Ethyl Ketone		+			N	N		
Methyl IsoButyl Ketone	 				N	N		
Molybdenum Trioxide	 				N N	N		
n-Butyl Alcohol	 				Y	N		
Naphthalene	2.00	2.00	12,149	11,893	Y	Y		
Nickel Compounds	2.00	2.00	12,149	11,873	<u>1</u>	N		
Nitric Acid	 				- N Y	N N		
sec-Butyl Alcohol	 				N	N		
Sulfuric Acid	1				N	N		
Toluene	 				N	N		
Xylene	2.00	2.00	12,149	11,893	- Y	<u>Y</u>		
Zinc Compounds	4.40	4.40	26,728	26,164	Y	- <u>'</u> Y		
1,2,4-Trimethylbenzene	7.70	4.10	20,720	20,104	- 	<u>.</u>		
Total	 		86,865	85,032				
NOTES	1		00,000	65,052				
(1)Concentrations From Yen	kin-Majestic Pe	rsonnel						
FORMULAS	,							
(2)Total Processed x (Concer	ntration/100).							

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT			Yenkin-Majestic P-9810 Primer					
- 2002 SARA Title III -			2002 2001					
- Section 313 Reporting -			Processed/Us		9,668	23,296		
			Den	sity (lb/gal):	9.59			
					Threshold (lbs)			
Section 313 C				Volatiles:	10,000			
Contained in Coil Coat	ing Line Sup	plies	1	Nonvolatiles:	25,000			
			Quantity	(a) of	Exceeds	Reportable		
	Concent	ration(1)	313 Che	mical	Threshold	Based on		
Section 313	(Weig	tht %)	(lbs		for Facility	De-Minimis		
Chemical	2002	2001	2002	2001	(Y or N)	(Y or N)		
Ammonia					N	N		
Antimony Compounds					N	N		
Arsenic Compounds					N	N		
Cadmium Compounds					N	N		
Chlorine					N	N		
Chromium Compounds					Y	N		
Cobalt Compounds					N	N		
Copper Compounds					N	N		
Cumene					N	N		
Cyanide Compounds					N	N		
Dimethyl Phthalate	1				N	N		
Glycol Ethers	2.79	2.79	2,587	6,233	Y	Y		
Ethyl Acrylate					N	N		
Ethylbenzene	0.80	0.80	742	1,787	Y	Y		
Formaldehyde	0.20	0.20	185	447	N	Y		
Hydrochloric Acid					N	N		
Hydrogen Fluoride					N	N		
Lead Compounds	+				N	Y		
Manganese Compounds	+-+				N	N		
Methyl Ethyl Ketone	 				N	N		
Methyl IsoButyl Ketone	 				N	N		
Molybdenum Trioxide	1				N	N		
n-Butyl Alcohol	1.50	1.50	1,391	3,351	Y	Y		
Naphthalene	2.00	2.00	1,854	4,468	Y	Y		
Nickel Compounds	1		.,55		N	N		
Nitric Acid	+-+				Y	N		
sec-Butyl Alcohol	1				N	N		
Sulfuric Acid	 				N	N		
Toluene	+				N.	N		
Xylene	2.30	2.30	2,132	5,138	Y	Y		
Zinc Compounds	1.19	1.19	1,101	2,653	Y	Y		
1,2,4-Trimethylbenzene	/		-,-,-	-,	Y	N		
Total	1		9,993	24,078				
NOTES	ــــــــــــــــــــــــــــــــــــــ		7,555	,	······································			
(1)Concentrations From Yen	kin-Majestio	Personnel						
FORMULAS								
(2)Total Processed x (Conce	ntration/100).						

WHEELING CORRUGATING CO. Yenkin-Majestic E-2421 Regular Gray BEECH BOTTOM PLANT - 2002 SARA Title III -2002 2001 Processed/Used (gals): 64,136 90,116 - Section 313 Reporting -10.75 Density (lb/gal): Threshold (lbs) Section 313 Chemicals Volatiles: 10,000 25,000 Contained in Coil Coating Line Supplies Nonvolatiles: Exceeds Reportable Quantity(a) of 313 Chemical Concentration(1) Threshold Based on Section 313 (Weight %) (lbs) for Facility De-Minimis 2001 2001 2002 (Y or N) (Y or N) Chemical 2002 Ammonia N Ν N N Antimony Compounds N N Arsenic Compounds Cadmium Compounds N N Chlorine N N Y Chromium Compounds N N N. Cobalt Compounds Copper Compounds N N Cumene N N N N Cyanide Compounds Dimethyl Phthalate N N Glycol Ethers Ÿ N Ethyl Acrylate N N Ÿ 5.00 5.00 34,473 48,437 Y Ethylbenzene Formaldehyde N N N N Hydrochloric Acid Hydrogen Fluoride N N N Υ Lead Compounds Manganese Compounds N N Methyl Ethyl Ketone N N Methyl IsoButyl Ketone N N Molybdenum Trioxide N N 5.00 Y 5.00 Y 34,473 48,437 n-Butyl Alcohol Y Naphthalene N Nickel Compounds N N Nitric Acid Y N sec-Butyl Alcohol N N Sulfuric Acid N N Toluene N N Xylene 5.00 5.00 34,473 48,437 Y Ÿ Zinc Compounds Y N 1,2,4-Trimethylbenzene 5.00 5.00 34,473 48,437 Y Ÿ 137,892 193,749 NOTES (1)Concentrations From Yenkin-Majestic Personnel

FORMULAS

(2)Total Processed x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT		Yenkin-Majestic E-2489 High Heat Gray					
- 2002 SARA			2002 2001				
			Processed/I	lead (male):	38,994	16.692	
- Section 313 R	eporting -		Processed/U		38,994 9.5	10,072	
			Der	nsity (lb/gal):	9.3 hreshold (lbs	`	
0 112 0	ham-!!-				10,000	1	
Section 313 Chemicals			Volatiles:				
Contained in Coil Coat	ing Line Sup	piles		Nonvolatiles:	23,000		
			Quantit	y(a) of	Exceeds	Reportable	
	Concentra	ation(1)	313 Ch		Threshold	Based on	
Section 313	(Weigl	` '	(lb	s)	for Facility	De-Minimis	
Chemical	2002	2001	2002	2001	(Y or N)	(Y or N)	
Ammonia					N	N	
Antimony Compounds					N	N	
Arsenic Compounds					N	N	
Cadmium Compounds					N	N	
Chlorine					N	N	
Chromium Compounds					Y	N	
Cobalt Compounds					N	N	
Copper Compounds					N	N	
Cumene					N	N	
Cyanide Compounds					N	N	
					N	N	
Dimethyl Phthalate	5.00	5.00	18,522	7,929	Y	Y	
Glycol Ethers	5.00	3.00	18,322	7,929	N	N	
Ethyl Acrylate			3.704	1 500	Y	Y	
Ethylbenzene	1.00	1.00	3,704	1,586	N	N	
Formaldehyde					N N	N	
Hydrochloric Acid					N	N	
Hydrogen Fluoride					N	Y	
Lead Compounds					N	N	
Manganese Compounds					N	N	
Methyl Ethyl Ketone							
Methyl IsoButyl Ketone					N	N	
Molybdenum Trioxide	10.55	10.55		16.65-	N	N	
n-Butyl Alcohol	10.00	10.00	37,044	15,857	Y	Y	
Naphthalene	5.00	5.00	18,522	7,929	Y	Y	
Nickel Compounds					N	N	
Nitric Acid					Y	N	
sec-Butyl Alcohol					N	N	
Sulfuric Acid		·			N	N	
Toluene					N	N	
Xylene	5.00	5.00	18,522	7,929	Y	Y	
Zinc Compounds					Y	N	
1,2,4-Trimethylbenzene					Y	N	
Total			96,315	41,229			
NOTES							
(1)Concentrations From Yer	ıkin-Majestio	Personnel					
FORMULAS							
(2)Total Processed x (Conce	ntration/100	`					

			T				
WHEELING CORRI	IGATING	CO.					
BEECH BOTTO			BASF - Summary of All Products				
- 2002 SARA			2002 2001				
- Section 313 Reporting -			Processed/L	sed (gals).	9,029	0	
- Section 313 Reporting			1	ity (lb/gal):			
			<u>1</u>	hreshold (lb	<u>s)</u>		
Section 313 Chemicals		ļ	Volatiles:				
Contained in Coil Coati	ng Line Su	pplies		onvolatiles	25,000		
	Ţ		Quantit	y(a) of	Exceeds	Reportable	
	Concent	ration(1)	313 Ch	emical	Threshold		
Section 313	(Weig		(lb		, .	De-Minimis	
Chemical	2002	2001	2002	2001	(Y or N)	(Y or N)	
Ammonia					N	N	
Antimony Compounds	1.00		3		N	Y	
Arsenic Compounds					N	N	
Cadmium Compounds					N	N	
Chlorine					N	N	
Chromium Compounds	1.00		2,911		Y	Y	
Cobalt Compounds					N	N	
Copper Compounds					N	N	
Cumene					N	Ν	
Cyanide Compounds					N	N	
Dimethyl Phthalate					N	N	
Glycol Ethers	1.00		11,141		Y	Y	
Ethyl Acrylate					N	N	
Ethylbenzene	1.00		428		Y	Y	
Formaldehyde					N	N	
Hydrochloric Acid					N	N	
Hydrogen Fluoride					N	N	
Lead Compounds					N	Y	
Manganese Compounds					N	N	
Methyl Ethyl Ketone					N	N	
Methyl IsoButyl Ketone					N	N	
Molybdenum Trioxide					N	N	
n-Butyl Alcohol	1.00		591		Y	Y	
Naphthalene	1.00		2,233		Y	Y	
Nickel Compounds	1.00		6		N	Y	
Nitric Acid					Y	N	
sec-Butyl Alcohol					N	N	
Sulfuric Acid					N	N	
Toluene					N	N	
Xylene	1.00		1,298		Y	Y	
Zinc Compounds	1.00		586		Y	Y	
1,2,4-Trimethylbenzene	1.00		1,966		Y	Y	
Total			21,165				
NOTES					,		
(1)Concentrations From Ye	nkin-Majes	tic Person	nel				
FORMULAS							
(2)Total Processed x (Conce	entration/10	0).					

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Valspar - Summary of All Products - 2002 SARA Title III -2002 2001 - Section 313 Reporting -Processed/Used (gals): 206,970 NA Avg. Density (lb/gal): 10.33 Threshold (lbs) Volatiles: 10,000 Section 313 Chemicals Contained in Coil Coating Line Supplies Nonvolatiles: 25,000 Quantity(1) of Exceeds Reportable Concentration, Max. (1) 313 Chemical Threshold Based on for Facility (Weight %) (lbs) De-Minimis Section 313 2002 2001 2002 2001 (Y or N) (Y or N) Chemical N N Ammonia 2,801 N Y Antimony Compounds Arsenic Compounds N N N N Cadmium Compounds N Chlorine N Chromium Compounds 108,470 124,485 Y Y Y Cobalt Compounds 60 Ν Ÿ N 38 39 Copper Compounds 1 3,927 5,780 Y 1 N Cumene Cyanide Compounds N N Dimethyl Phthalate 3.5 38 Ν Y Y 107,057 159,563 Y Glycol Ethers ī 0.01 0.14 N N Ethyl Acrylate 1,456 343 Y Ethylbenzene 1 Formaldehyde 1,083 750 N Ÿ N N Hydrochloric Acid Hydrogen Fluoride N N 1,140 N Y Lead Compounds 1 Manganese Compounds 1 571 321 Ν Y Ÿ N Methyl Ethyl Ketone 3 N N

Total NOTES

(1)Maximum concentrations for any coating, or set at 1% to trigger for threshold determination. Quantities from Valspar 2002 report.

1

1

58,330

24,327

1,849

5,140

215

14,835

5,204

83,082

419,628

N

Y

Ÿ

N

Y

N

N

N

Y

Y

Y

34,580

19,639

8,739

14,642

6,470

115,814

491,187

22

N

Ÿ

Y

Ÿ

N

Y

N Ÿ

Ÿ

Y

Y

FORMULAS

Methyl IsoButyl Ketone Molybdenum Trioxide

n-Butyl Alcohol

Nickel Compounds

Naphthalene

Nitric Acid sec-Butyl Alcohol

Sulfuric Acid

Zinc Compounds

1,2,4-Trimethylbenzene

Toluene

Xylene

(2) Total Processed x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT Methyl Ethyl Ketone (Cleaning Solvent) - 2002 SARA Title III -2002 2001 Processed/Used (gals): 490 490 - Section 313 Reporting -Density (lb/gal): 7.51 7.51 Threshold (lbs) Section 313 Chemicals Volatiles: 10,000 Contained in Coil Coating Line Supplies Nonvolatiles: 25,000 Quantity(a) of Exceeds Reportable Concentration(1) 313 Chemical Threshold Based on (Weight %) for Facility De-Minimis Section 313 (lbs) 2001 2002 2001 Chemical 2002 (Y or N) (Y or N) Ν N Ammonia N Antimony Compounds N Arsenic Compounds N N Cadmium Compounds N N Chlorine N N Chromium Compounds Ÿ N Cobalt Compounds N N Copper Compounds N N N Cumene N Cyanide Compounds N N Dimethyl Phthalate N N Glycol Ethers N Ethyl Acrylate N N Ethylbenzene Ÿ N Formaldehyde N N Hydrochloric Acid N N Hydrogen Fluoride N N Lead Compounds N Y Manganese Compounds N N Methyl Ethyl Ketone 100.00 100.00 3,680 3,680 N Ÿ Methyl IsoButyl Ketone N N N Molybdenum Trioxide N n-Butyl Alcohol Y N Naphthalene Y N Nickel Compounds N N Y Nitric Acid N sec-Butyl Alcohol N N Sulfuric Acid N N Toluene N N Xylene Y N Zinc Compounds Y N 1,2,4-Trimethylbenzene Ÿ N Total 3,680 3,680 NOTES (1)Concentrations From MSDS. **FORMULAS**

(2)Total Processed x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

- 2002 SARA Title III -- Section 313 Reporting -

Section 313 Chemicals

CSI Solvesso 100 (Cleaning Solvent)

2001 2002 21,126

Processed/Used (gals): Density (lb/gal): 21,000 7.51

7.51 Threshold (lbs)

Contained in Coil Coating Line Supplies

10,000

Volatiles: Nonvolatiles: 25,000

			0	- (-) -6	Exceeds	Damadabla	
	_		-	ty(a) of		Reportable	
	Concentration(1)			hemical	Threshold	Based on De-Minimis	
Section 313	(Weigh			bs)	for Facility	1	
Chemical	2002	2001	2002	2001	(Y or N)	(Y or N)	
Ammonia					N	N	
Antimony Compounds					N	N	
Arsenic Compounds					N	N	
Cadmium Compounds					N	N	
Chlorine					N	N	
Chromium Compounds					Y	N	
Cobalt Compounds					N	N	
Copper Compounds					N	N	
Cumene	1.50	1.50	2,380	2,366	N	Y	
Cyanide Compounds					N	N	
Dimethyl Phthalate					N	Z	
Glycol Ethers	T				Y	N	
Ethyl Acrylate					N	N	
Ethylbenzene					Y	N	
Formaldehyde					N	N	
Hydrochloric Acid					N	N	
Hydrogen Fluoride					N	N	
Lead Compounds					N	Y	
Manganese Compounds					N	N	
Methyl Ethyl Ketone	1				N	N	
Methyl IsoButyl Ketone					N	N	
Molybdenum Trioxide					N	N	
n-Butyl Alcohol	1				Y	N	
Naphthalene	 				Y	N	
Nickel Compounds	 				N	N	
Nitric Acid	+				Y	N	
sec-Butyl Alcohol	++				N	N	
Sulfuric Acid	 				N	N	
Toluene	1				N	N	
Xylene	0.50	0.50	793	789	Y	N	
Zinc Compounds	1		.,,,		Y	N	
1,2,4-Trimethylbenzene	27.50	27.50	43,628	43,368	Y	Y	
Total	1		46,801	46,522			

(1) Concentrations From Sunoco Solvent 100 MSDS (representative of several suppliers who produce this product to spec).

FORMULAS

(2) Total Processed x (Concentration/100).

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

2001 Summary of Section 313 Chemicals Contained in Coil Coating Line Supplies

	Coatings										
	Yenkin	Yenkin	Yenkin	Yenkin	Valspar	BASF	Methyl	Solvesso	Total	Total	
Section 313	Majestic	Majestic	Majestic	Majestic	All Products	All Products	Ethyl	100	Quantity	Quantity	Total
Chemical	E-1388	P-9810	E-2421	E-2489			Ketone		#1 CCL	#2 CCL	Quantity
	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)
Ammonia								**************************************			
Antimony Compounds											
Arsenic Compounds											
Cadmium Compounds											
Chlorine											
Chromium Compounds					124,485				124,485		124,485
Cobalt Compounds											
Copper Compounds					39				39		. 39
Cumene					5,780			2,366	8,146		8,146
Cyanide Compounds											
Dimethyl Phthalate											
Glycol Ethers	32,110	6,233		7,929	159,563				205,835		205,835
Ethyl Acrylate											
Ethylbenzene	2,973	1,787	48,437	1,586	343				55,126		55,126
Formaldehyde		447			750				1,197		1,197
Hydrochloric Acid											
Hydrogen Fluoride											
Lead Compounds											
Manganese Compounds					321				321		321
Methyl Ethyl Ketone							3,680		3,680		3,680
Methyl IsoButyl Ketone											
Molybdenum Trioxide											
n-Butyl Alcohol		3,351	48,437	15,857	34,580				102,226		102,226
Naphthalene	11,893	4,468		7,929	19,639				43,928		43,928
Nickel Compounds											
Nitric Acid											
sec-Butyl Alcohol					8,739				8,739		8,739
Sulfuric Acid											
Toluene					22				22		22
Xylene	11,893	5,138	48,437	7,929	14,642			789	88,828		88,828
Zinc Compounds	26,164	2,653			6,470				35,287		35,287
1,2,4-Trimethylbenzene			48,437		115,814			43,368	207,619		207,619
Totals	85,032	24,078	193,749	41,229	491,187		3,680	46,522	885,477		885,477

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

2002 Summary of Section 313 Chemicals Contained in Coil Coating Line Supplies

	Coatings										
	Yenkin	Yenkin	Yenkin	Yenkin	Valspar	BASF	Methyl	Solvesso	Total	Total	
Section 313	Majestic	Majestic	Majestic	Majestic	All Products	All Products	Ethyl	100	Quantity	Quantity	Total
Chemical	E-1388	P-9810	E-2421	E-2489			Ketone		#1 CCL	#2 CCL	Quantity
	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)
Ammonia											
Antimony Compounds					2,801	3			2,804		2,804
Arsenic Compounds											
Cadmium Compounds											
Chlorine											
Chromium Compounds					108,470	2,911			111,382		111,382
Cobalt Compounds					60				60		60
Copper Compounds					38				38		38
Cumene					3,927			2,380	5,907	400.0	6,307
Cyanide Compounds											
Dimethyl Phthalate					38				38		38
Glycol Ethers	32,802	2,587		18,522	107,057	11,141			131,942	40,167	172,109
Ethyl Acrylate					0				0		0.14
Ethylbenzene	3,037	742	34,473	3,704	1,456	428			16,027	27,814	43,841
Formaldehyde		185			1,083				1,268		1,268
Hydrochloric Acid											
Hydrogen Fluoride											
Lead Compounds					1,140				1,140		1,140
Manganese Compounds					571				571		571
Methyl Ethyl Ketone					3		3,680		3,683		3,683
Methyl IsoButyl Ketone											
Molybdenum Trioxide											
n-Butyl Alcohol		1,391	34,473	37,044	58,330	591			75,734	56,096	131,830
Naphthalene	12,149	1,854		18,522	24,327	2,233			33,562	25,523	59,086
Nickel Compounds					1,849	6			1,856		1,856
Nitric Acid											
sec-Butyl Alcohol					5,140				5,140		5,140
Sulfuric Acid											
Toluene					215				215		215
Xylene	12,149	2,132	34,473	18,522	14,835	1,298		793	36,269	47,935	84,204
Zinc Compounds	26,728	1,101			5,204	586			14,668	18,951	33,619
1,2,4-Trimethylbenzene			34,473		83,082	1,966		43,628	133,538	29,612	163,149
Totals	86,865	9,993	137,892	96,315	419,628	21,165	3,680	46,801	575,841	246,498	822,338

WHEELING CORRUGATING CO. BEECH BOTTOM PLANT

2002 SARA TITLE III - SECTION 313 - RELEASE INVENTORY

Summary of Section 313 Chemicals Contained in Coil Coating Line Supplies in Greater Than De-Minimis Concentrations

	in Greater Than De-Minimis Concentrations Coatings											
	Yenkin											
Section 313	Majestic	Majestic	Majestic	Majestic	All Products	All Products	Ethyl	100	Quantity	Total Quantify	Total	
Chemical	E-1388	P-9810	E-2421	E-2489			Ketone		#1 CCL	#2 CCL	Quantity	
	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(ibs)	(lbs)	(lbs)	(ibs)	
Ammonia												
Antimony Compounds					2,801	3			2,804		2,804	
Arsenic Compounds												
Cadmium Compounds												
Chlorine												
Chromium Compounds					108,470	2,911			111,382		111,383	
Cobalt Compounds					60				60		60	
Copper Compounds					38				38		38	
Cumene					3,927			2,380	5,907	400	6,30	
Cyanide Compounds												
Dimethyl Phthalate					38				38		- 38	
Glycol Ethers	32,802	2,587		18,522	107,057	11,141			131,942	40,167	172,109	
Ethyl Acrylate												
Ethylbenzene	3,037	742	34,473	3,704	1,456	428			16,027	27,814	43,841	
Formaldehyde		185			1,083				1,268		1,268	
Hydrochloric Acid												
Hydrogen Fluoride												
Lead Compounds					1,140				1,140		1,140	
Manganese Compounds					571				571		571	
Methyl Ethyl Ketone					3		3,680		3,683		3,683	
Methyl IsoButyl Ketone												
Molybdenum Trioxide												
n-Butyl Alcohol		1,391	34,473	37,044	58,330	591			75,734	56,096	131,830	
Naphthalene	12,149	1,854		18,522	24,327	2,233			33,562	25,523	59,086	
Nickel Compounds					1,849	6			1,856		1,856	
Nitric Acid												
sec-Butyl Alcohol					5,140				5,140		5,140	
Sulfuric Acid												
Toluene					215				215		21.5	
Xylene	12,149	2,132	34,473	18,522	14,835	1,298			35,609	47,801	83,410	
Zinc Compounds	26,728	1,101			5,204	586			14,668	18,951	33,619	
1,2,4-Trimethylbenzene			34,473		83,082	1,966		43,628	133,538	29,612	163,149	
Totals	86,865	9,993	137,892	96,315	419,628	21,165	3,680	46,008	575,181	246,364	821,545	